

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW MEXICO**

In re:

ROMAN CATHOLIC CHURCH OF THE
ARCHDIOCESE OF SANTA FE, a New Mexico
corporation sole,

Debtor.

Chapter 11

Case No. 18-13027-t11

**FIRST INTERIM APPLICATION FOR ALLOWANCE AND PAYMENT
OF PROFESSIONAL COMPENSATION AND REIMBURSEMENT OF
EXPENSES BY PACHULSKI STANG ZIEHL & JONES LLP FOR THE
PERIOD FROM DECEMBER 18, 2018 THROUGH SEPTEMBER 30, 2019**

Pachulski Stang Ziehl & Jones LLP (“PSZJ”), counsel for the Official Committee of Unsecured Creditors (the “Committee”) of the Roman Catholic Church of the Archdiocese of Santa Fe (the “Debtor”), hereby files its *First Interim Application for Allowance and Payment of Professional Fees and Reimbursement of Expenses of Pachulski Stang Ziehl & Jones LLP for the Period From December 18, 2018 Through September 30, 2019* (the “Application”) pursuant to 11 U.S.C. § 330, Federal Rule of Bankruptcy Procedure 2016, NM LBR 2016-1.1, the United States Trustee’s *Operating Guidelines and Reporting Requirements for Debtors in Possession and Trustees*, revised June 11, 2012 (the “UST Guidelines”), and the *Order Authorizing and Approving the Retention of Pachulski Stang Ziehl & Jones LLP as Counsel to the Official Committee of Unsecured Creditors* [Docket No. 60], entered on March 3, 2014. This Application is supported by the following: (1) the Declaration of Ilan D. Scharf, attached hereto at Exhibit E, in which Mr. Scharf, a partner of PSZJ, has verified the statements PSZJ has made in the Application, and has confirmed PSZJ’s compliance with 11 U.S.C. § 504, Federal Rule of Bankruptcy Procedure 2016, NM LBR 2016-1.1, and the UST Guidelines; (2) Exhibits A-D attached to the Application, which provide descriptions of PSZJ’s professional services and

expenses incurred during the Compensation Period; and (3) the entire record before the Court in the above-captioned Case. In support of its Application, PSZJ respectfully states as follows:

Relief Requested

1. Pursuant to this Application, PSZJ requests that the Court enter an order granting PSZJ's fees and expenses incurred during the period December 18, 2018 through September 30, 2019 (the "Compensation Period"); and permitting payment to PSZJ, on an interim basis, of fees in the amount of \$402,065.00 and reimbursement of expenses in the amount of \$10,480.04, for a total of \$412,545.04. This Application presents a core proceeding over which the Court has jurisdiction to enter a final decision pursuant to 28 U.S.C. § 157(a)-(b) and 28 U.S.C. § 1334.

General background

2. On December 3, 2018 (the "Petition Date"), the Debtor commenced its chapter 11 case by filing a voluntary petition for relief under chapter 11 of Title 11 of the United States Code (as amended from time to time, the "Bankruptcy Code"). The Debtor is authorized to operate its businesses as a debtor-in-possession. To date, no trustee or examiner has been appointed in this case.

3. On or about December 18, 2018, the United States Trustee (the "U.S. Trustee") appointed the Official Committee of Unsecured Creditors (the "Committee") to represent the Debtor's unsecured creditors. *See Appointment of a Committee of Unsecured Creditors in a Chapter 11 Case* [Docket No. 53]. The Committee is comprised of nine (9) survivors of sexual abuse by individuals for whom the Debtor was responsible. No other Committee has been appointed in this case.

4. On December 26, 2018, the Committee filed an application with the Court for authorization to employ PSZJ pursuant to Bankruptcy Code sections 327 and 1102, and Federal Rule of Bankruptcy Procedure 2014. *See Application of the Official Committee of Unsecured Creditors for Entry of an Order, Pursuant to 11 U.S.C. § § 327 and 1103, and Fed. R. Bank. P. 2014, Authorizing and Approving the Employment and Retention of Pachulski Stang Ziehl & Jones LLP as Counsel to the Official Committee of Unsecured Creditors Effective December 18, 2018* [Doc. 54] (the “PSZJ Employment Application”).

5. On January 4, 2019, the Court entered an order authorizing the Committee to employ PSZJ as counsel effective as of December 18, 2018. *See Order Authorizing Employment of Pachulski Stang Ziehl & Jones LLP as Counsel to the Official Committee of Unsecured Creditors* [Docket No. 60] (the “PSZJ Employment Order”).

6. Pursuant to the PSZJ Employment Order, upon Court approval, the Debtor is authorized to pay PSZJ interim compensation in the amount of 75% of billed fees and 100% of reimbursable costs on paid fees and costs. *See PSZJ Employment Order*, ¶ 3. PSZJ has not been paid any compensation or been reimbursed for any expenses to date.

Case Status

7. The Debtor commenced its Case in order to address its liability for sexual abuse perpetrated by priests and others for whom the Diocese was responsible. During the Compensation Period, PSZJ’s efforts were focused on the groundwork for understanding claims against the Debtor and the assets available to pay those claims. The objective of these efforts is to negotiate a plan of reorganization that embodies a settlement of sexual abuse claims asserted against the Debtor or, if necessary, to litigate matters that clarify the scope of the Debtor’s assets or recover assets for the benefit of the estate. These tasks primarily consisted of: negotiating a

bar date and procedures for asserting sexual abuse claims; reviewing approximately 386 sexual abuse claims asserted against the Debtor; preparing document requests to the Debtor and various related entities; analyzing documents produced by the Debtor and other entities; reviewing the Debtor's assets; assessing the value of the Debtor's assets; reviewing and analyzing the Debtor's insurance policies; negotiating nondisclosure agreements with the Debtor and other entities; and preparing for mediation with the Debtor and other entities; met with the Committee regularly to advise them of various matters in the chapter 11 case; and advised the Committee regarding pleadings and litigation regarding the Debtor's chapter 11 case. The Committee, the Debtor, its insurers and various entities that may also be liable for sexual abuse claims asserted against the Debtor attended a two-day mediation session and have scheduled a follow up session.

No Prior Compensation

8. This Application is the first application that PSZJ filed in this case for allowance and payment of professional fees and reimbursement of expenses. PSZJ has not received any compensation for services it rendered and expenses it incurred during the Compensation Period or during any other period.

Summary of PSZJ'S Legal Services and Expenses Incurred During the Compensation Period

9. PSZJ maintains contemporaneous records of the time it expends for professional services it performs and expenses it incurs in connection with this case. PSZJ maintains these detailed records in the ordinary course of its business. Exhibit A¹ provides a summary of these incurred fees and expenses during the Compensation Period.

¹ Pursuant to the PSZJ Employment Application, PSZJ has capped its fees at a rate of \$675. One PSZJ attorney's time was erroneously billed at \$775 for 1.5 hours. However, PSZJ seeks compensation for that time at the capped rate of \$675.

10. By this Application and pursuant to the PSZJ Employment Order, PSZJ seeks approval and payment of 100% of its fees, in the amount of \$402,065.00, plus 100% of its expenses, in the amount of \$10,480.04, for a total of \$412,545.04. PSZJ notes that its fees and expenses are those that PSZJ customarily charges to other clients in the ordinary course of its practice, with the exception of the reduction of all of its attorneys' hourly billing rates to a maximum of \$675.00 per hour.

11. To assist the Court in its review of PSZJ's fees and expenses, Exhibit B contains PSZJ's bills for the Compensation Period, Exhibit C contains a summary of PSZJ's bills, separated into subject matter categories relating specifically to this chapter 11 case, and Exhibit D contains a summary of expenses incurred by PSZJ by category.

Summary of Legal Services Performed

12. Set forth below is a summary of legal services provided by PSZJ. Such services are described in detail in the fee statements attached hereto as Exhibit B and such statements are incorporated herein by reference for all purposes.

A. Asset Analysis/Recovery:
118.10 Hours Expended and \$77,880.00 of Fees Incurred

13. Work performed in this category relates to PSZJ's efforts to assess the Debtor's assets, claims available to the Debtor's estate, and sources of recovery for creditors of the Debtor's estate. In this case, asset analysis is particularly important in order to value the Debtor's assets and investigate claims against third parties in order to maximize value available to pay creditors. Specifically work in this category during the Compensation Period included: (i) seeking information from The Catholic Foundation and Catholic Cemetery Association; (ii) drafting and serving Rule 2004 motions for The Catholic Foundation, Catholic Cemetery

Association, and Deposit and Loan Fund and conducting research in connection with the same; (iii) reviewing and analyzing information produced by or on behalf of the Debtor, The Catholic Foundation, Catholic Cemetery Association, and Deposit and Loan Fund; (iv) assessing the financial and legal relationships of the Debtor and the Parishes of the Diocese; (v) conducting a detailed analysis of the Debtor's real property; (vi) reviewing relevant discovery from prepetition litigation; (vii) reviewing and analyzing minutes of the Debtor's Finance Committee; (viii) drafting and revising a confidentiality agreement and conferring and corresponding with state court counsel regarding the same; and (ix) analyzing alter ego claims.

B. Asset Disposition:

2.10 Hours Expended and \$1,417.50.00 of Fees Incurred

14. Work in this category relates to services performed by PSZJ relating to asset sales and disposition. During the Compensation Period, PSZJ conferred with parties regarding real property disposition.

C. Avoidance Actions:

7.60 Hours Expended and \$4,940.00 of Fees Incurred

15. Work in this category relates to services performed by PSZJ relating to avoidance claims. During the Compensation Period, PSZJ conducted research with respect to the reachback period for fraudulent transfer or similar claims.

D. Bankruptcy Litigation\Litigation:

5.20 Hours Expended and \$3,510.00 of Fees Incurred

16. This category relates to services provided by PSZJ with respect to litigating related matters in this case. During the Compensation Period, PSZJ specifically provided the following services in this category: (i) reviewed and analyzed complaints and

exclusivity motion; and (ii) conferred and corresponded with state court counsel regarding removal of state court counsel.

E. Case Administration:
3.50 Hours Expended and \$2,242.50 of Fees Incurred

17. This category relates to administrative matters for this case. During the Compensation Period, PSZJ specifically provided the following services related to case administration: (i) drafted and updated task lists; (ii) drafted pro hac vice motions; (iii) conferred with Debtor's counsel regarding case status and administrative matters; (iv) conferred regarding mediator selection, claims, and document review; and (v) internal correspondence regarding case status.

F. Claims Objection/Administration:
137.70 Hours Expended and \$77,040.00 of Fees Incurred

18. This category relates to services provided by PSZJ with respect to administering, reviewing, and assessing claims against the Debtor. During the Compensation Period, PSZJ specifically provided the following services, among others, related to claims administration: (i) prepared, revised, and finalized the form for abuse claims and conferred and corresponded regarding the same; (ii) revised the bar date motion and conferred and corresponded with parties regarding the same; (iii) conferred and corresponded with Committee regarding claims and document production; (iv) reviewed and analyzed approximately 386 claims asserted against the Debtor; (v) revised the confidentiality form; (vi) conducted extensive review and analysis of claims and conferred and corresponded regarding the same; (vii) drafted and maintained claims summary charts; (viii) redacted claims; (ix) conducted an analysis of

perpetrators of sexual abuse and potentially liable third parties; (x) conferred with counsel regarding emergency motion to disclose survivor identity; (xi) reviewed motion regarding enforcement of procedures; and (xii) conferred with survivors regarding claims process.

G. Compensation of Professionals:

4.10 Hours Expended and \$2,767.50 of Fees Incurred

19. This category relates to services provided by PSZJ with respect to compensation of professionals. During Compensation Period, PSZJ revised and edited PSZJ's monthly invoices in preparation of fee applications.

H. Employee Benefit/Pension:

2.70 Hours Expended and \$1,822.50 of Fees Incurred

20. This category relates to employee issues. During the Compensation Period, PSZJ: (i) reviewed the workers compensation motion and conferred and corresponded regarding the same; and (ii) conferred regarding pension payments.

I. Financial Filings:

0.40 Hours Expended and \$270.00 of Fees Incurred

21. Time billed to this category relates to the review of the Debtor's amendment to schedules of assets and liabilities and statements of financial affairs and its first monthly operating report.

J. Financing:

3.00 Hours Expended and \$2,025.00 of Fees Incurred

22. This category includes work related to the Debtor's proposed debtor in possession financing and use of cash collateral. During the Compensation Period, PSZJ: (i) reviewed the cash collateral stipulation and corresponded regarding the same; and (ii) reviewed the Debtor's monthly operating reports.

K. General Creditors Committee:
127.10 Hours Expended and \$85,792.50 of Fee Incurred

23. This category relates to services provided by PSZJ with respect to meeting with the Committee to provide updates regarding the status of the case and to advise the Committee regarding ongoing matters in the case. During the Compensation Period, PSZJ specifically provided the following services, among others, related to this category: (i) prepared Committee meeting agendas; (ii) prepared for meetings with the Committee; (iii) attended Committee meetings (including telephonic meetings); (iv) prepared for and attended in-person meetings with Committee, state court counsel, and other parties; (v) conferred with, corresponded, and advised the Committee regarding case status and ongoing matters in this case; (vi) inspected real property of the Debtor; (vii) responded to creditor inquiries regarding the case; (viii) conferred with the Debtor's professionals regarding case matters, including the bar date, claims, and other issues; (ix) prepared memoranda for the Committee regarding various issues in this case; and (x) established a call-in line for creditors, reviewed messages on the line and maintained a call log of the same.

L. Hearing:
3.80 Hours Expended and \$2,565.00 of Fees Incurred

24. This category relates to services provided by PSZJ with respect to preparing for and attending hearings before this Court.²

² PSZJ also billed for similar services in the Bankruptcy Litigation and Plan/Disclosure Statement categories. Although categorized differently, there is no duplication of such services.

M. Insurance Coverage:
118.80 Hours Expended and \$80,910.00 of Fees Incurred

25. This category relates to services provided by PSZJ with respect to insurance coverage available to the Debtor. During the Compensation Period, PSZJ specifically provided the following services, among others, related to insurance coverage: (i) reviewed and analyzed insurance requests received from the Debtor; (ii) reviewed and revised the insurance confidentiality agreement and conferred and corresponded regarding the same; (iii) reviewed and analyzed settlement agreements and conferred and corresponded regarding various issues with respect to the same; (iv) prepared and maintained a settlement impact chart; (v) conducted research regarding legal issues relating to insurance, including third party beneficiaries and settlement enforceability; (vi) conferred and corresponded regarding insurance policies; (vii) conferred with the Debtor's counsel and state court counsel regarding insurance coverage; (viii) reviewed and analyzed claims covered by the Debtor's insurance policies; (ix) reviewed and analyzed documents received from the Debtor; and (x) prepared for and attended mediation.

N. Meeting of Creditors:
22.90 Hours Expended and \$15,607.50 of Fees Incurred

26. Services in this category relate to PSZJ's preparation for and attendance at the 341(a) meeting of creditors.

O. Operations:
1.80 Hours Expended and \$1,215.00 of Fees Incurred

27. This category relates to services provided by PSZJ with respect to reviewing monthly operating reports.

P. Plan and Disclosure Statement:
23.20 Hours Expended and \$15,660.00 of Fees Incurred

28. This category relates to services provided by PSZJ with respect to advising the Committee with respect to preparation for mediation with the objective of negotiating a settlement to be memorialized in a plan of reorganization. During the Compensation Period, PSZJ specifically provided the following services, among others, related to this category: (i) conferred and corresponded with state court counsel regarding allocation plans; (ii) conferred and corresponded regarding mediation and discovery; and (iii) prepared claims analysis for mediation.

Q. PSZ&J Compensation:
0.20 Hours Expended and \$135.00 of Fees Incurred

29. Services in this category relate to review and correspondence regarding PSZJ's invoices. Time in this category is related to, but not duplicative of, services provided in the Compensation of Professionals category.

R. Retention of Professionals:
3.90 Hours Expended and \$2,632.50 of Fees Incurred

30. This category relates to services provided by PSZJ with respect to retention of professionals for the Debtor and the Committee. During the Compensation Period, PSZJ specifically provided the following services, among others, related to this category: (i) finalizing PSZJ's retention application; (ii) conducted research regarding disclosure issues and prepared memo in connection with the same; (iii) analyzed Rule 2014 disclosure and issues with respect to the same; and (iv) drafted its supplemental employment declaration.

S. Stay Litigation:
7.60 Hours Expended and \$5,130.00 of Fees Incurred

31. This category relates to services provided by PSZJ with respect to litigating requests for relief from the automatic stay. During the Compensation Period, PSZJ specifically provided the following services, among others, related to this category: (i) reviewed and analyzed motions for relief from stay and related pleadings; and (ii) conferred and corresponded regarding quiet title action.

T. Travel:
57.00 Hours Expended and \$19,237.50 of Fees Incurred

32. This category relates to time expended by PSZJ with respect to nonworking travel. Time billed in this category is charged at 50% of PSZJ's rates.

SUMMARY OF EXPENSES INCURRED

33. PSZJ also requests approval and reimbursement of expenses it expended during the Compensation Period in the amount of \$10,480.04, as set forth in the summary attached as Exhibit D to this Application. PSZJ notes that these expenses are customary charges made to other of PSZJ's clients in the ordinary course of its billing practice.

**PSZJ'S FEES AND EXPENSES SHOULD
BE AWARDED UNDER APPLICABLE LAW**

34. The fees and expenses PSZJ requests by this Application are an appropriate award for its services as counsel to the Committee.

A. Factors Used to Evaluate Requests for Compensation

35. Pursuant to section 330 of the Bankruptcy Code, the Court may award to a professional person "reasonable compensation for actual, necessary services rendered" and

“reimbursement for actual, necessary expenses” the professional incurred. *See* 11 U.S.C. § 330(a)(1)(A)-(B). As set forth above and in the exhibits to this Application, the fees for which PSZJ requests compensation and the expenses PSZJ incurred for which it seeks reimbursement are for actual and necessary services and expenses incurred during the Compensation Period.

36. The professional services PSZJ rendered have required time and effort. During the Compensation Period, professionals and paraprofessionals at PSZJ recorded 651.40 hours at a reduced hourly rate capped at \$675.00. PSZJ’s blended hourly rate for the Compensation Period including paraprofessionals is \$617.98; PSZJ’s blended hourly rate for the Compensation Period excluding paraprofessionals is \$643.59.

37. Time and labor devoted is only one of many pertinent factors in determining an award of fees and costs. Based on the skills brought to bear in this case, the results obtained, and the accepted lodestar approach discussed below, PSZJ submits that the compensation it requests by this Application is reasonable and appropriate.

**B. The Lodestar Award Should be Calculated by
Multiplying a Reasonable Hourly Rate by the Hours Worked**

38. In the Tenth Circuit, “the adjusted lodestar approach is used to calculate reasonable attorney’s fees under 11 U.S.C. § 330(a).” *Market Center East Retail Property, Inc. v. Lurie (In re Market Center East Retail Property, Inc.)*, 730 F.3d 1239, 1246 (10th Cir. 2013). *Blum vs. Stenson*, 465 U.S. 886 (1984), defined the so-called lodestar calculation:

The initial estimate of a reasonable attorney’s fee is properly calculated by multiplying the number of hours reasonably expended on the [matter] times a reasonable hourly rate.

Id. at 888.

39. The lodestar factors that determine the reasonableness of fees include the items listed in section 330(a)(3) of the Bankruptcy Code and the 12 factors set forth in *Johnson v. Georgia Highway Express, Inc.* 488 F.2d 714 (5th Cir. 1974). See *Market Center*, 730 F.3d at 1246. Section 330(a)(3) provides that the amount of reasonable compensation to be awarded to a professional shall include “the nature, the extent, and the value of such services, taking into account” the following relevant factors: (1) the time spent on the services; (2) the rates charged; (3) whether the services were necessary or beneficial at the time they were rendered; (4) whether the services were performed within a reasonable amount of time “commensurate with the complexity, importance, and nature of the problem, issue, or task;” (5) the professionals’ demonstrated skill and experience in the bankruptcy field; and (6) whether the compensation is reasonable “based on the customary compensation charged by comparably skilled practitioners in cases other than cases” under title 11. 11 U.S.C. § 330(a)(3)(A)-(F). The *Johnson* factors are as follows: (1) the time and labor required in the case; (2) the novelty and difficulty of the questions; (3) the skill requisite to perform the service properly; (4) the preclusion of other employment due to acceptance of this case; (5) the customary fee; (6) whether the fee is fixed or contingent; (7) time limitations imposed by the client or circumstances; (8) the amount of money involved and results obtained; (9) the experience, reputation, and ability of the attorneys; (10) the “undesirability” of the case; (11) the nature and length of the attorneys’ professional relationship with the client; and (12) awards in similar cases.” *Market Center*, 730 F.3d at 1247 (quoting *Johnson*, 488 F.3d at 717-19).

40. Under the factors set forth in section 330(a)(3) and *Johnson*, PSZJ’s fees in this Application are reasonable. As discussed above, PSZJ’s rates in this case are capped below PSZJ’s standard hourly rates for similar cases. The PSZJ attorneys with principal

responsibility for this representation have vast experience representing committee's in cases filed by entities that are part of the Roman Catholic Church, such as the Debtor. As such, PSZJ brings unparalleled experience to these cases and is able to address matters efficiently based on its attorneys' knowledge of the workings and organization structures of Roman Catholic dioceses in the United States. PSZJ provided a benefit to the estate through the services described above, all of which were necessary to provide a reasonable process for sexual abuse survivors to assert confidential claims against the Debtor, analyze the claims filed, analyze assets (including insurance, real property and property in which the Debtor may have an interest) available to pay claimants, and prepare for mediation of a global settlement of sexual abuse claims against the Debtor to memorialized in a plan of reorganization. All matters have undertaken in an effort to maximize value for creditors and in an efficient manner.

WHEREFORE, PSZJ prays this Court to enter an Order (1) allowing interim compensation to PSZJ in the amount of \$412,545.04 (which is comprised of fees in the amount of \$402,065.00 plus 100% reimbursement of PSZJ's expenses in the amount of \$10,480.04 that PSZJ expended during the Compensation Period); (2) directing the Debtor to pay PSZJ the interim amount of \$412,545.04; and (3) granting such other and further relief as the Court deems just and proper.

Dated: November 26, 2019

Respectfully submitted,

PACHULSKI STANG ZIEHL & JONES LLP

By /s/ Ilan D. Scharf

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- and -

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Counsel for the Official Committee of
Unsecured Creditors

EXHIBIT A

**SUMMARY OF TIME CHARGES AND HOURLY RATES
BY PROFESSIONAL AND PARAPROFESSIONAL**

Professional's Name and Title	Year Admitted	Hours	Rate	Fees
Stang, James I., Partner	1980	21.00	\$337.50	\$7,087.50
Stang, James I., Partner	1980	192.60	\$675.00	\$130,005.00
Pachulski, Isaac M., Partner	1974	0.40	\$675.00	\$270.00
Goldich, Stanley E., Partner	1980	3.00	\$675.00	\$2,025.00
Brown, Kenneth, Partner	1981	3.00	\$675.00	\$2,025.00
Davidson, Jeffrey H., Partner	1977	1.70	\$675.00	\$1,147.50
Nasatir, Ian, Partner	1983	104.10	\$675.00	\$70,267.50
Scharf, Ilan D., Partner	2001	36.00	\$337.50	\$12,150.00
Scharf, Ilan D., Partner	2001	240.90	\$675.00	\$162,270.00
Fried, Joshua M., Partner	1996	1.00	\$675.00	\$675.00
Glazer, Gabriel I., Partner	2006	5.10	\$675.00	\$3,442.50
Mackle, Cia H., Of counsel	2006	7.60	\$650.00	\$4,940.00
Golden, Steven W., Associate	2015	1.20	\$575.00	\$690.00
Hinojosa, Diane, Paralegal	N/A	33.80	\$150.00	\$5,070.00
TOTAL		651.40		\$402,065.00

EXHIBIT B
(Billing Statements)

Pachulski Stang Ziehl & Jones LLP

10100 Santa Monica Blvd.
13th Floor
Los Angeles, CA 90067

January 01, 2019

Invoice 122014

Client 05066

Matter 00002

JIS

JIS

RE: Committee Representation

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 12/31/2018

FEES \$4,942.50

EXPENSES \$322.75

TOTAL CURRENT CHARGES **\$5,265.25**

TOTAL BALANCE DUE **\$5,265.25**

Summary of Services by Task Code

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
CA	Case Administration [B110]	1.70	\$1,027.50
GC	General Creditors Comm. [B150]	5.50	\$3,712.50
RP	Retention of Prof. [B160]	0.30	\$202.50
		<hr/> 7.50	<hr/> \$4,942.50

Summary of Services by Professional

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
IDS	Scharf, Ilan D.	Partner	675.00	0.50	\$337.50
JIS	Stang, James I.	Partner	675.00	4.30	\$2,902.50
KHB	Brown, Kenneth H.	Partner	675.00	1.50	\$1,012.50
SWG	Golden, Steven W.	Associate	575.00	1.20	\$690.00
				<hr/> 7.50	<hr/> \$4,942.50

Summary of Expenses

<u>Description</u>	<u>Amount</u>
Airport Parking	\$43.00
Auto Travel Expense [E109]	\$23.02
Conference Call [E105]	\$37.63
Hotel Expense [E110]	\$172.85
Pacer - Court Research	\$7.30
Postage [E108]	\$4.45
Reproduction/ Scan Copy	\$34.50
	<hr/>
	\$322.75

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Case Administration [B110]						
12/19/2018	SWG	CA	Draft pro hac vice application,NOA, an retention application.	1.00	575.00	\$575.00
12/19/2018	SWG	CA	Prepare bylaws.	0.20	575.00	\$115.00
12/28/2018	IDS	CA	Call with Debtor's counsel regarding case status and plan.	0.50	675.00	\$337.50
				<hr/>		
				1.70		\$1,027.50

General Creditors Comm. [B150]

12/21/2018	JIS	GC	Email to Committee regarding status and bankruptcy articles.	0.40	675.00	\$270.00
12/26/2018	JIS	GC	Telephone conference with Brad Hall and Levi Monagle regarding case issues.	1.60	675.00	\$1,080.00
12/28/2018	JIS	GC	Telephone call with F. Elsaesser and other Debtors'	1.20	675.00	\$810.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			counsel regarding bar date, confidentiality of documents, AG contacts, pending projects and insurance.			
12/28/2018	JIS	GC	Draft email to State Court Counsel on conference call with Debtor's bankruptcy counsel.	0.80	675.00	\$540.00
12/28/2018	KHB	GC	Initial call with Committee.	1.20	675.00	\$810.00
12/28/2018	KHB	GC	Emails from J. Stang re Committee call.	0.20	675.00	\$135.00
12/28/2018	KHB	GC	Email from J. Stang re fraudulent transfer complaint.	0.10	675.00	\$67.50
				<hr/> 5.50		<hr/> \$3,712.50

Retention of Prof. [B160]

12/21/2018	JIS	RP	Final review of employment application and forward to Committee for signature and return.	0.10	675.00	\$67.50
12/26/2018	JIS	RP	Final review of employment application and prepare for filing.	0.20	675.00	\$135.00
				<hr/> 0.30		<hr/> \$202.50

TOTAL SERVICES FOR THIS MATTER:

\$4,942.50

Expenses

12/18/2018	AP	LAX Airport, JIS	43.00
12/18/2018	AT	Auto Travel Expense [E109] Uber Transportation Service, JIS	11.96
12/18/2018	HT	Hotel Expense [E110] Hyatt Regency Albuquerque Hotel, 1 night, JIS	152.59
12/18/2018	HT	Hotel Expense [E110] Hyatt Regency Albuquerque Hotel, working meal, JIS	20.26
12/19/2018	AT	Auto Travel Expense [E109] Uber Transportation Services, JIS	11.06
12/19/2018	RE2	SCAN/COPY (15 @0.10 PER PG)	1.50
12/19/2018	RE2	SCAN/COPY (207 @0.10 PER PG)	20.70
12/19/2018	RE2	SCAN/COPY (3 @0.10 PER PG)	0.30
12/26/2018	PO	05066.00001 :Postage Charges for 12-26-18	4.45
12/26/2018	RE2	SCAN/COPY (20 @0.10 PER PG)	2.00
12/26/2018	RE2	SCAN/COPY (100 @0.10 PER PG)	10.00
12/28/2018	CC	Conference Call [E105] AT&T Conference Call, JIS	37.48
12/28/2018	CC	Conference Call [E105] AT&T Conference Call, JIS	0.07
12/28/2018	CC	Conference Call [E105] AT&T Conference Call, JIS	0.08
12/31/2018	PAC	Pacer - Court Research	7.30
Total Expenses for this Matter			\$322.75

REMITTANCE ADVICE

Please include this Remittance with your payment

For current services rendered through: 12/31/2018

Total Fees \$4,942.50

Total Expenses 322.75

Total Due on Current Invoice \$5,265.25

Outstanding Balance from prior invoices as of 01/01/2019 (May not include recent payments)

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
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Total Amount Due on Current and Prior Invoices:	\$5,265.25
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Pachulski Stang Ziehl & Jones LLP

10100 Santa Monica Blvd.
13th Floor
Los Angeles, CA 90067

January 31, 2019

Invoice 122274

Client 05066

Matter 00002

JIS

JIS

RE: Committee Representation

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 01/31/2019

FEES	\$58,605.00
EXPENSES	\$1,970.37
TOTAL CURRENT CHARGES	\$60,575.37
BALANCE FORWARD	\$138,178.92
A/R Adjustments	-\$60,222.87
TOTAL BALANCE DUE	\$138,531.42

Summary of Services by Professional

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
GIG	Glazer, Gabriel I.	Partner	675.00	3.10	\$2,092.50
IAWN	Nasatir, Iain A. W.	Partner	675.00	2.20	\$1,485.00
IDS	Scharf, Ilan D.	Partner	337.50	16.00	\$5,400.00
IDS	Scharf, Ilan D.	Partner	675.00	36.80	\$24,840.00
IDS	Scharf, Ilan D.	Partner	775.00	1.50	\$1,162.50
JIS	Stang, James I.	Partner	337.50	9.00	\$3,037.50
JIS	Stang, James I.	Partner	675.00	29.40	\$19,845.00
KHB	Brown, Kenneth H.	Partner	675.00	1.10	\$742.50
				<hr/> 99.10	<hr/> \$58,605.00

Summary of Services by Task Code

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AA	Asset Analysis/Recovery[B120]	18.80	\$12,690.00
CA	Case Administration [B110]	0.40	\$270.00
CO	Claims Admin/Objections[B310]	8.40	\$5,670.00
EB	Employee Benefit/Pension-B220	2.70	\$1,822.50
FF	Financial Filings [B110]	0.30	\$202.50
FN	Financing [B230]	2.60	\$1,755.00
GC	General Creditors Comm. [B150]	13.30	\$8,977.50
IC	Insurance Coverage	3.20	\$2,160.00
LN	Litigation (Non-Bankruptcy)	1.00	\$675.00
MC	Meeting of Creditors [B150]	22.90	\$15,607.50
SL	Stay Litigation [B140]	0.50	\$337.50
TR	Travel	25.00	\$8,437.50
		99.10	<hr/> \$58,605.00

Summary of Expenses

<u>Description</u>	<u>Amount</u>
Air Fare [E110]	\$512.30
Airport Parking	\$65.00
Auto Travel Expense [E109]	\$48.24
Conference Call [E105]	\$235.25
CourtLink	\$69.48
Hotel Expense [E110]	\$387.15
Pacer - Court Research	\$6.90
Postage [E108]	\$2.35
Reproduction Expense [E101]	\$3.00
Reproduction/ Scan Copy	\$6.20
Travel Expense [E110]	\$206.02
Transcript [E116]	\$428.48
	<hr/>
	\$1,970.37

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Asset Analysis/Recovery[B120]						
01/02/2019	JIS	AA	Review deposition of Hucmala (property manager).	0.90	675.00	\$607.50
01/02/2019	JIS	AA	Review of financial documents, including property lists and 2017 redacted financial statement.	1.30	675.00	\$877.50
01/02/2019	GIG	AA	Emails with J. Stang re financial statements.	0.10	675.00	\$67.50
01/03/2019	JIS	AA	Review and high level edit of discovery request.	0.30	675.00	\$202.50
01/03/2019	IDS	AA	Review petition; first day pleadings; schedules	2.40	675.00	\$1,620.00
01/03/2019	GIG	AA	Review financial statements, notes re swap agreement description	0.80	675.00	\$540.00
01/03/2019	GIG	AA	Consider swap agreement accounting, prepare summary of same	2.00	675.00	\$1,350.00
01/04/2019	GIG	AA	Confer with J. Stang re swap agreement accounting	0.20	675.00	\$135.00
01/05/2019	KHB	AA	Email to J. Stang re 544(a)(3) issues.	0.30	675.00	\$202.50
01/05/2019	KHB	AA	Review financial statement re Parish interests.	0.30	675.00	\$202.50
01/05/2019	KHB	AA	Review email from J. Stang re document request re insurance coverage.	0.10	675.00	\$67.50
01/05/2019	IDS	AA	Review email from Committee member regarding property and respond regarding same	0.40	675.00	\$270.00
01/07/2019	IDS	AA	Review financial statements; email to James I. Stang regarding same	2.20	675.00	\$1,485.00
01/17/2019	JIS	AA	Review 341 transcript and prepare initial list of follow up requests.	2.80	675.00	\$1,890.00
01/17/2019	JIS	AA	Finalize document request.	0.70	675.00	\$472.50
01/18/2019	JIS	AA	Review of John Daniel deposition dated July 12, 2018.	0.90	675.00	\$607.50
01/21/2019	JIS	AA	Review and revise second document request to Debtor.	0.50	675.00	\$337.50
01/22/2019	IDS	AA	Email to James I. Stang regarding MOR	0.80	675.00	\$540.00
01/22/2019	IDS	AA	Telephone conference with James I. Stang regarding MOR	0.30	675.00	\$202.50
01/22/2019	IDS	AA	Email to Debtor regarding MOR	0.70	675.00	\$472.50
01/23/2019	JIS	AA	Review C. Montoya request regarding document production; telephone conference with B. Hall regarding same and email to C. Montoya.	0.20	675.00	\$135.00
01/25/2019	KHB	AA	Email from J. Stang re document requests to Debtor.	0.10	675.00	\$67.50
01/30/2019	JIS	AA	Telephone conference with Bruce Anderson regarding document production status.	0.50	675.00	\$337.50

				18.80		\$12,690.00
Case Administration [B110]						
01/16/2019	IDS	CA	Draft PSZJ task list.	0.40	675.00	\$270.00
				0.40		\$270.00
Claims Admin/Objections[B310]						
01/07/2019	JIS	CO	Review additional questions for proof of claim.	0.20	675.00	\$135.00
01/08/2019	IDS	CO	Review interrogatory form from case	0.80	675.00	\$540.00
01/14/2019	IDS	CO	Telephone conference with Jim Stang regarding bar date.	0.20	675.00	\$135.00
01/14/2019	IDS	CO	Work on abuse POC form.	0.40	675.00	\$270.00
01/14/2019	IDS	CO	Revise abuse POC form.	0.40	675.00	\$270.00
01/15/2019	IDS	CO	Revise POC for abuse claims.	0.60	675.00	\$405.00
01/16/2019	JIS	CO	Conference call with Debtor regarding bar date motion.	0.50	675.00	\$337.50
01/16/2019	JIS	CO	Review draft proof of claim and forward to State Court Counsel for comment.	0.20	675.00	\$135.00
01/16/2019	IDS	CO	Telephone conference with Debtor's counsel regarding POC and bar date.	0.50	675.00	\$337.50
01/16/2019	IDS	CO	Finalize draft POC.	0.40	675.00	\$270.00
01/16/2019	IDS	CO	Telephone conference with Jim Stang regarding POC.	0.20	675.00	\$135.00
01/21/2019	JIS	CO	Finalize proof of claim form and circulate to State Court Counsel.	0.30	675.00	\$202.50
01/23/2019	IDS	CO	Email to Committee regarding POC form.	0.20	675.00	\$135.00
01/23/2019	IDS	CO	Prepare for Committee call; review agenda and attachments.	0.40	675.00	\$270.00
01/24/2019	JIS	CO	Email to Committee regarding meeting and document production.	0.10	675.00	\$67.50
01/25/2019	IDS	CO	Revise bar date motion	1.80	675.00	\$1,215.00
01/28/2019	IDS	CO	Revise bar date motion	1.20	675.00	\$810.00
				8.40		\$5,670.00
Employee Benefit/Pension-B220						
01/17/2019	KHB	EB	Confer with J. Stang re RFRA issues on connection with pension payments.	0.20	675.00	\$135.00
01/18/2019	JIS	EB	Review self insurance application and revise draft	0.80	675.00	\$540.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			email regarding objections and email to State Court Counsel regarding same.			
01/18/2019	IDS	EB	Review workers comp motion (.8); email to James I. Stang regarding same (.4)	1.20	675.00	\$810.00
01/23/2019	IDS	EB	Review email from Debtor regarding workers com motion and debtor response.	0.50	675.00	\$337.50
				<u>2.70</u>		<u>\$1,822.50</u>

Financial Filings [B110]

01/22/2019	JIS	FF	Telephone conference with I. Scharf regarding first MOR and set of questions.	0.30	675.00	\$202.50
				<u>0.30</u>		<u>\$202.50</u>

Financing [B230]

01/07/2019	IDS	FN	Review cash collateral stipulation	0.80	675.00	\$540.00
01/07/2019	IDS	FN	Email to James I. Stang regarding cash collateral stipulation	0.40	675.00	\$270.00
01/21/2019	IDS	FN	Review MOR	1.40	675.00	\$945.00
				<u>2.60</u>		<u>\$1,755.00</u>

General Creditors Comm. [B150]

01/02/2019	JIS	GC	Telephone conference with Levi Monagle regarding agenda for Committee call.	0.20	675.00	\$135.00
01/02/2019	IDS	GC	Committee call regarding bar date, 341 meeting and other case issues.	1.40	675.00	\$945.00
01/02/2019	IDS	GC	Prepare for committee call; prepare agenda for same.	0.20	675.00	\$135.00
01/02/2019	IDS	GC	Email to Committee regarding call.	0.20	675.00	\$135.00
01/02/2019	IDS	GC	Telephone conference with Jim Stang regarding Committee call.	0.20	675.00	\$135.00
01/03/2019	JIS	GC	Call from media regarding bankruptcy concepts applicable to case.	0.50	675.00	\$337.50
01/07/2019	JIS	GC	Conference call with F. E;saesser and B. Anderson regarding 341 meeting, schedules, bar date.	1.00	675.00	\$675.00
01/07/2019	IDS	GC	Email to Committee regarding in-person meeting	0.20	675.00	\$135.00
01/08/2019	IDS	GC	Prepare for in-person committee meeting	1.00	675.00	\$675.00
01/10/2019	IDS	GC	Meet with F. Elsaesser regarding general case issues.	1.00	675.00	\$675.00
01/10/2019	IDS	GC	Meet with SCC regarding post - 341 Meeting issues.	1.00	675.00	\$675.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/11/2019	JIS	GC	Telephone conference with Albuquerque Journal regarding 341 meeting.	0.50	675.00	\$337.50
01/16/2019	IDS	GC	Call with Committee regarding 341 Meeting, bar date and other issues.	1.00	675.00	\$675.00
01/17/2019	JIS	GC	Committee meeting.	1.00	675.00	\$675.00
01/17/2019	JIS	GC	Telephone conference with Brad Hall and L. Monagle regarding bar date, removal of state court actions, stay relief and Plan classification.	0.90	675.00	\$607.50
01/22/2019	JIS	GC	Prepare agenda and accompanying materials for Committee meeting (1/23/19).	0.20	675.00	\$135.00
01/23/2019	JIS	GC	Creditors Committee meeting.	1.00	675.00	\$675.00
01/28/2019	JIS	GC	Draft proposed agenda and forward to Committee.	0.10	675.00	\$67.50
01/30/2019	JIS	GC	Committee meeting.	0.70	675.00	\$472.50
01/30/2019	IDS	GC	Committee meeting	1.00	675.00	\$675.00
				13.30		\$8,977.50

Insurance Coverage

01/03/2019	IAWN	IC	Review insurance requests, analyze (.7), exchange emails and telephone conferences with James I Stang re same (.3)	1.00	675.00	\$675.00
01/03/2019	JIS	IC	Telephone conference with I. Nasatir regarding insurance request from Debtor.	0.40	675.00	\$270.00
01/03/2019	JIS	IC	Draft email to State Court Counsel regarding insurance document request.	0.40	675.00	\$270.00
01/04/2019	JIS	IC	Review insurance request email and send to Debtor's counsel.	0.10	675.00	\$67.50
01/30/2019	IAWN	IC	Office conference with James I Stang re coverage issues (.3), review coverage map (.1), exchange emails and office conferences with James I Stang re discovery re loss runs (.3), review email from James I Stang re Catholic Mutual structure/piercing, analyze and respond re same. (.5)	1.20	675.00	\$810.00
01/30/2019	JIS	IC	Office conference with I. Nasatir regarding "claims run" and CM structure.	0.10	675.00	\$67.50
				3.20		\$2,160.00

Litigation (Non-Bankruptcy)

01/23/2019	JIS	LN	Telephone conference with T. Walker regarding removal (.3); email to State Court Counsel regarding	0.60	675.00	\$405.00
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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			removal and alternatives (.3).			
01/23/2019	JIS	LN	Review and respond to email regarding removal of claims against third party defendants.	0.30	675.00	\$202.50
01/23/2019	KHB	LN	Email from J. Stang re remand issues.	0.10	675.00	\$67.50
				1.00		\$675.00

Meeting of Creditors [B150]

01/04/2019	JIS	MC	Telephone conference with I. Scharf Review regarding issues related to 341(a) meeting questions.	0.20	675.00	\$135.00
01/04/2019	JIS	MC	Review schedules for 341 meeting and email to I. Scharf regarding same and review issues related to BFP status for estate.	1.80	675.00	\$1,215.00
01/04/2019	IDS	MC	Telephone conference with James I. Stang regarding 341 meeting	0.40	675.00	\$270.00
01/04/2019	IDS	MC	Email to Committee regarding 341 meeting	0.40	675.00	\$270.00
01/04/2019	IDS	MC	Prepare questions for 341 meeting	1.80	675.00	\$1,215.00
01/07/2019	JIS	MC	Review/revise 341a questions.	0.90	675.00	\$607.50
01/07/2019	IDS	MC	Continue drafting questions for 341 meeting	1.80	675.00	\$1,215.00
01/07/2019	IDS	MC	Telephone conference with James I. Stang regarding 341 meeting	0.40	675.00	\$270.00
01/07/2019	IDS	MC	Email to UST regarding 341 meeting	0.20	675.00	\$135.00
01/10/2019	JIS	MC	Breakfast with F. Elsaesser regarding case (1.5); review and revise 341(a) questions (1.5); meeting with Committee members regarding 341 meeting (1.5); attend 341 meeting (3.0).	7.50	675.00	\$5,062.50
01/10/2019	IDS	MC	Attend 341 Meeting.	3.00	675.00	\$2,025.00
01/10/2019	IDS	MC	Meet with Committee to prepare for 341 Meeting.	1.50	675.00	\$1,012.50
01/10/2019	IDS	MC	Meet with Jim Stang to prepare for 341 Meeting.	1.50	675.00	\$1,012.50
01/10/2019	IDS	MC	Meet with J. Stang and F. Elsaesser to prepare for 341.	1.50	775.00	\$1,162.50
				22.90		\$15,607.50

Stay Litigation [B140]

01/22/2019	JIS	SL	Review Romero stay relief motion.	0.50	675.00	\$337.50
				0.50		\$337.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Travel						
01/09/2019	JIS	TR	Travel from Los Angeles to Albuquerque for 341 meeting. (Billed at 1/2 rate)	5.00	337.50	\$1,687.50
01/09/2019	IDS	TR	Travel from Washington, DC to New Mexico. (Billed at 1/2 rate)	8.00	337.50	\$2,700.00
01/10/2019	JIS	TR	Travel from Albuquerque to Los Angeles from 341 meeting. (Billed at 1/2 rate)	4.00	337.50	\$1,350.00
01/11/2019	IDS	TR	Travel from New Mexico to New York. (Billed at 1/2 rate)	8.00	337.50	\$2,700.00
				<hr/> 25.00		<hr/> \$8,437.50
TOTAL SERVICES FOR THIS MATTER:						\$58,605.00

Expenses

01/02/2019	CC	Conference Call [E105] Loopup- JIS	0.14
01/02/2019	CC	Conference Call [E105] Loopup- JIS	0.14
01/02/2019	CC	Conference Call [E105] Loopup- JIS	98.51
01/03/2019	TE	Travel Expense [E110] Travel Agency Fee, JIS	50.00
01/04/2019	AF	Air Fare [E110] American Airlines, Tkt 00172359670663, Albuquerque/LA, JIS	512.30
01/04/2019	PO	05066.00001 :Postage Charges for 01-04-19	2.35
01/04/2019	RE2	SCAN/COPY (5 @0.10 PER PG)	0.50
01/07/2019	CC	Conference Call [E105] AT&T Conference Call, IDS	8.81
01/07/2019	RE	(15 @0.20 PER PG)	3.00
01/08/2019	CL	05066.00001 CourtLink charges for 01-08-19	69.48
01/09/2019	RE2	SCAN/COPY (16 @0.10 PER PG)	1.60
01/10/2019	AT	Auto Travel Expense [E109] Uber Transportation Service, JIS	11.88
01/11/2019	AP	LAX Airport Parking , JIS	65.00
01/11/2019	AT	Auto Travel Expense [E109] Uber Transportation Service, IDS	7.35
01/11/2019	AT	Auto Travel Expense [E109] Uber Transportation Service, IDS	7.45
01/11/2019	AT	Auto Travel Expense [E109] Uber Transportation Service,	5.00

IDS			
01/11/2019	AT	Auto Travel Expense [E109] Uber Transportation Service, IDS	3.00
01/11/2019	AT	Auto Travel Expense [E109] Uber Transportation Service, JIS	2.00
01/11/2019	AT	Auto Travel Expense [E109] Uber Transportation Service, JIS	11.56
01/11/2019	HT	Hotel Expense [E110] DoubleTree hotel, Albuquerque, 1 night, IDS	202.67
01/11/2019	HT	Hotel Expense [E110] Andaluz Hotel, 1 night, JIS	184.48
01/16/2019	CC	Conference Call [E105] Loopup- JIS	45.84
01/16/2019	RE2	SCAN/COPY (1 @0.10 PER PG)	0.10
01/16/2019	TR	Transcript [E116] Kendra Tellez Court Reporting, Inc., Inv. 19-00047, JIS	428.48
01/17/2019	RE2	SCAN/COPY (31 @0.10 PER PG)	3.10
01/22/2019	TE	Travel Expense [E110] Carlos Montoya, mileage to creditors meeting in Alburquerque, JIS	156.02
01/23/2019	CC	Conference Call [E105] Loopup- JIS	46.27
01/23/2019	RE2	SCAN/COPY (7 @0.10 PER PG)	0.70
01/23/2019	RE2	SCAN/COPY (2 @0.10 PER PG)	0.20
01/30/2019	CC	Conference Call [E105] Loopup- JIS	35.54
01/31/2019	PAC	Pacer - Court Research	6.90
Total Expenses for this Matter			\$1,970.37

REMITTANCE ADVICE

Please include this Remittance with your payment

For current services rendered through: 01/31/2019

Total Fees \$58,605.00

Total Expenses 1,970.37

Total Due on Current Invoice \$60,575.37

Outstanding Balance from prior invoices as of 01/31/2019 (May not include recent payments)

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
122014	01/01/2019	\$4,942.50	\$322.75	\$5,265.25
122027	02/28/2019	\$30,157.50	\$277.50	\$30,435.00
122029	03/31/2019	\$42,255.00	\$0.80	\$42,255.80

Total Amount Due on Current and Prior Invoices: \$138,531.42

Pachulski Stang Ziehl & Jones LLP

10100 Santa Monica Blvd.
13th Floor
Los Angeles, CA 90067

February 28, 2019

Invoice 122027

Client 05066

Matter 00002

JIS

JIS

RE: Committee Representation

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 02/28/2019

FEES	\$30,157.50
EXPENSES	\$277.50
TOTAL CURRENT CHARGES	\$30,435.00
BALANCE FORWARD	\$65,488.12
TOTAL BALANCE DUE	\$95,923.12

Summary of Services by Task Code

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AA	Asset Analysis/Recovery[B120]	26.00	\$15,712.50
BL	Bankruptcy Litigation [L430]	0.40	\$270.00
CO	Claims Admin/Objections[B310]	7.80	\$5,265.00
FF	Financial Filings [B110]	0.10	\$67.50
GC	General Creditors Comm. [B150]	9.40	\$6,345.00
IC	Insurance Coverage	2.90	\$1,957.50
LN	Litigation (Non-Bankruptcy)	0.80	\$540.00
		<u>47.40</u>	<u>\$30,157.50</u>

Summary of Services by Professional

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
DHH	Hinojosa, Diane H.	Other	150.00	3.50	\$525.00
IAWN	Nasatir, Iain A. W.	Partner	675.00	1.20	\$810.00
IDS	Scharf, Ilan D.	Partner	675.00	13.80	\$9,315.00
JIS	Stang, James I.	Partner	675.00	27.90	\$18,832.50
JMF	Fried, Joshua M.	Partner	675.00	1.00	\$675.00
				<u>47.40</u>	<u>\$30,157.50</u>

Summary of Expenses

<u>Description</u>	<u>Amount</u>
Pacer - Court Research	\$114.90
Reproduction Expense [E101]	\$162.60
	<u>\$277.50</u>

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Asset Analysis/Recovery[B120]						
02/12/2019	JIS	AA	Call with Debtors' counsel regarding document production (.5) and initial review of Dropbox production (.7).	1.20	675.00	\$810.00
02/13/2019	JIS	AA	Review of 2 years minutes.	2.20	675.00	\$1,485.00
02/14/2019	JIS	AA	Review of minutes of Finance Committee.	0.60	675.00	\$405.00
02/14/2019	DHH	AA	Review Archdiocese of Santa Fe Finance Council Minutes (2009 - 2018).	2.00	150.00	\$300.00
02/15/2019	JIS	AA	Review of all finance council committee minutes.	2.80	675.00	\$1,890.00
02/15/2019	DHH	AA	Complete review of Archdiocese of Santa Fe Finance Council Minutes (2009 - 2018) and prepare chart re missing Minutes.	1.50	150.00	\$225.00
02/18/2019	JIS	AA	Draft third document production request.	2.10	675.00	\$1,417.50
02/19/2019	JIS	AA	Review emails from State Court Counsel regarding insurance confidentiality agreement; revise confidentiality agreement.	0.60	675.00	\$405.00
02/19/2019	JIS	AA	Review Dropbox materials-restricted funds materials and manuals.	3.80	675.00	\$2,565.00
02/22/2019	JIS	AA	Complete review of first dropbox response to Doc. Request No. 2 and draft follow up questions/requests.	2.80	675.00	\$1,890.00
02/25/2019	JIS	AA	Conference call with F. Elsaesser, B/ Hall and L. Monagle regarding third production request.	0.80	675.00	\$540.00
02/25/2019	JIS	AA	Review/revise confidentiality agreement as to Informal Discovery and forward to Debtor's counsel.	0.20	675.00	\$135.00
02/25/2019	IDS	AA	Review Finance Committee minutes (2009)	1.00	675.00	\$675.00
02/25/2019	IDS	AA	Update investigation notes	0.80	675.00	\$540.00
02/26/2019	JIS	AA	Email to Debtor's counsel regarding status of confidentiality agreement on insurance matters.	0.10	675.00	\$67.50
02/26/2019	JIS	AA	Review insurance confidentiality agreement.	0.20	675.00	\$135.00
02/27/2019	IDS	AA	Review finance committee minutes	1.80	675.00	\$1,215.00
02/28/2019	JIS	AA	Emails regarding confidentiality stipulations.	0.20	675.00	\$135.00
02/28/2019	IDS	AA	Review debtor discovery	1.30	675.00	\$877.50
				26.00		\$15,712.50

Bankruptcy Litigation [L430]

02/26/2019	IDS	BL	Brief review Paickattu complaint	0.40	675.00	\$270.00
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				0.40		\$270.00
Claims Admin/Objections[B310]						
02/01/2019	IDS	CO	Review filed bar date motion.	0.60	675.00	\$405.00
02/01/2019	IDS	CO	Email to Committee regarding bar date motion.	0.20	675.00	\$135.00
02/13/2019	JIS	CO	Telephone conference with State Court Counsel regarding bar date issues and mediation.	0.40	675.00	\$270.00
02/21/2019	IDS	CO	Review Gebhard comments to POC Form	0.40	675.00	\$270.00
02/22/2019	JIS	CO	Review Proof of Claim confidentiality agreement and revised Proof of Claim.	0.50	675.00	\$337.50
02/22/2019	IDS	CO	Review revised confi agreement	0.40	675.00	\$270.00
02/22/2019	IDS	CO	Email to R. Anderson regarding Confi and POC Form	0.20	675.00	\$135.00
02/22/2019	IDS	CO	Telephone conference with James I. Stang regarding revised POC and Confi Forms	0.40	675.00	\$270.00
02/25/2019	IDS	CO	Telephone conference with B. Gebhart regarding POC Form	0.40	675.00	\$270.00
02/25/2019	IDS	CO	Telephone conference with James I. Stang regarding bar date Form	0.20	675.00	\$135.00
02/26/2019	JIS	CO	Review I.Scharf comments to bar date order and related notices.	0.20	675.00	\$135.00
02/26/2019	JIS	CO	Telephone conference with State Court Counsel regarding bar date proof of claim form.	0.20	675.00	\$135.00
02/26/2019	IDS	CO	Telephone conference with B. Anderson regarding POC Forms	0.20	675.00	\$135.00
02/26/2019	IDS	CO	Review and revise proposed bar date Order	0.60	675.00	\$405.00
02/26/2019	IDS	CO	Review POC Form and notices; revise same	1.80	675.00	\$1,215.00
02/28/2019	IDS	CO	Revise bar date package	0.70	675.00	\$472.50
02/28/2019	IDS	CO	Telephone conference with B. Anderson regarding Doe objection	0.20	675.00	\$135.00
02/28/2019	IDS	CO	Review Doe objection to bar date	0.20	675.00	\$135.00
				7.80		\$5,265.00
Financial Filings [B110]						
02/19/2019	JIS	FF	Review notice of amendment of SOAL and SOFA and email to debtor re same.	0.10	675.00	\$67.50
				0.10		\$67.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
General Creditors Comm. [B150]						
02/01/2019	JIS	GC	Telephone conference with C. Lujan regarding Chavez criminal fees; telephone conference with B. Anderson regarding same and follow up email.	0.20	675.00	\$135.00
02/13/2019	JIS	GC	Committee meeting.	0.70	675.00	\$472.50
02/14/2019	JIS	GC	Call with certain counsel regarding facts of case.	0.80	675.00	\$540.00
02/14/2019	IDS	GC	Committee call regarding bar date and discovery.	1.00	675.00	\$675.00
02/20/2019	JIS	GC	Conference call with Debtor's counsel regarding removal, doc production, mediation, etc.	1.00	675.00	\$675.00
02/20/2019	JIS	GC	Telephone conference with State Court Counsel regarding conference call with Debtor.	1.00	675.00	\$675.00
02/20/2019	JIS	GC	Email to Committee regarding status in lieu of meeting.	0.60	675.00	\$405.00
02/26/2019	JIS	GC	Call with State Court Counsel regarding mediation, stay issues.	0.80	675.00	\$540.00
02/27/2019	JIS	GC	Conference call with State Court Counsel regarding mediation, stay, confidentiality agreement.	1.30	675.00	\$877.50
02/27/2019	JIS	GC	Committee meeting.	1.00	675.00	\$675.00
02/27/2019	IDS	GC	Committee call	1.00	675.00	\$675.00
				9.40		\$6,345.00
Insurance Coverage						
02/14/2019	IAWN	IC	Review James I Stang letter from committee to debtor re insurance information, and related emails	0.20	675.00	\$135.00
02/14/2019	IAWN	IC	Review and analyze confidentiality agreement, comment re same to James I Stang	0.70	675.00	\$472.50
02/14/2019	JIS	IC	Review/revise insurance confidentiality agreement.	0.70	675.00	\$472.50
02/19/2019	IAWN	IC	Review James I Stang email re confidentiality agreement	0.10	675.00	\$67.50
02/21/2019	JMF	IC	Review and edit confidentiality agreement.	1.00	675.00	\$675.00
02/26/2019	IAWN	IC	Review James I Stang email re confidentiality agreement	0.10	675.00	\$67.50
02/28/2019	IAWN	IC	Review James I Stang email re confidentiality agreement	0.10	675.00	\$67.50
				2.90		\$1,957.50

Pachulski Stang Ziehl & Jones LLP
Archdiocese of Santa Fe O.C.C.
05066 - 00002

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February 28, 2019

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Litigation (Non-Bankruptcy)						
02/13/2019	JIS	LN	Email to State Court Counsel regarding removal of state court actions.	0.20	675.00	\$135.00
02/20/2019	JIS	LN	Draft email to State Court Counsel regarding removal issues.	0.60	675.00	\$405.00
				<hr/> 0.80		<hr/> \$540.00
TOTAL SERVICES FOR THIS MATTER:						\$30,157.50

Expenses

02/15/2019	RE	(199 @0.20 PER PG)	39.80
02/15/2019	RE	(406 @0.20 PER PG)	81.20
02/15/2019	RE	(205 @0.20 PER PG)	41.00
02/19/2019	RE	(3 @0.20 PER PG)	0.60
02/28/2019	PAC	Pacer - Court Research	114.90
Total Expenses for this Matter			\$277.50

REMITTANCE ADVICE

Please include this Remittance with your payment

For current services rendered through: 02/28/2019

Total Fees \$30,157.50

Total Expenses 277.50

Total Due on Current Invoice \$30,435.00

Outstanding Balance from prior invoices as of 02/28/2019 (May not include recent payments)

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
122014	01/01/2019	\$4,942.50	\$322.75	\$5,265.25
122016	01/31/2019	\$58,252.50	\$1,970.37	\$60,222.87

Total Amount Due on Current and Prior Invoices: \$95,923.12

Pachulski Stang Ziehl & Jones LLP

10100 Santa Monica Blvd.
13th Floor
Los Angeles, CA 90067

March 31, 2019

Invoice 122029

Client 05066

Matter 00002

JIS

JIS

RE: Committee Representation

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 03/31/2019

FEES	\$42,255.00
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EXPENSES	\$0.80
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TOTAL CURRENT CHARGES	\$42,255.80
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BALANCE FORWARD	\$95,923.12
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TOTAL BALANCE DUE	\$138,178.92
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Summary of Services by Task Code

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
		0.70	\$472.50
AA	Asset Analysis/Recovery[B120]	12.10	\$8,167.50
BL	Bankruptcy Litigation [L430]	1.30	\$877.50
CO	Claims Admin/Objections[B310]	5.70	\$3,847.50
GC	General Creditors Comm. [B150]	11.50	\$7,762.50
HE	Hearing	2.60	\$1,755.00
IC	Insurance Coverage	21.00	\$14,175.00
PD	Plan & Disclosure Stmt. [B320]	0.80	\$540.00
SL	Stay Litigation [B140]	6.90	\$4,657.50
		<u>62.60</u>	<u>\$42,255.00</u>

Summary of Services by Professional

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
IAWN	Nasatir, Iain A. W.	Partner	675.00	19.30	\$13,027.50
IDS	Scharf, Ilan D.	Partner	675.00	30.20	\$20,385.00
JIS	Stang, James I.	Partner	675.00	13.10	\$8,842.50
				<u>62.60</u>	<u>\$42,255.00</u>

Summary of Expenses

<u>Description</u>	<u>Amount</u>
Reproduction/ Scan Copy	\$0.80
	<u>\$0.80</u>

			<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/25/2019	IDS	Email to James Stang regarding SHF claim.	0.40	675.00	\$270.00
03/25/2019	IDS	Email to SCC regarding SHF claim.	0.30	675.00	\$202.50
			0.70		\$472.50

Asset Analysis/Recovery[B120]

03/05/2019	JIS	AA	Telephone conference with B. Hall regarding document production.	0.40	675.00	\$270.00
03/05/2019	IDS	AA	Review document requests.	0.40	675.00	\$270.00
03/05/2019	IDS	AA	Continue review of minutes; update discovery notes.	1.40	675.00	\$945.00
03/08/2019	IDS	AA	Continue asset analysis reviewing debtor documents.	1.40	675.00	\$945.00
03/12/2019	JIS	AA	Review revise and send confidentiality agreement.	0.40	675.00	\$270.00
03/13/2019	IDS	AA	Review documents from debtor.	1.70	675.00	\$1,147.50
03/14/2019	IDS	AA	Complete review of minutes produced by debtor.	2.50	675.00	\$1,687.50
03/18/2019	JIS	AA	Revisions to confidentiality agreement.	0.50	675.00	\$337.50
03/21/2019	IDS	AA	Finish reviewing documents produced by ADSF.	3.40	675.00	\$2,295.00
				12.10		\$8,167.50

Bankruptcy Litigation [L430]

03/04/2019	IDS	BL	Telephone conference with counsel for JW regarding stay.	0.30	675.00	\$202.50
03/04/2019	IDS	BL	Telephone conference with Jim Stang regarding Paickatta complaint.	0.20	675.00	\$135.00
03/28/2019	IDS	BL	Telephone call with Bruce regarding bar date; litigation; discovery.	0.80	675.00	\$540.00
				<hr/> 1.30		<hr/> \$877.50

Claims Admin/Objections[B310]

03/13/2019	IDS	CO	Review revised bar date order.	0.70	675.00	\$472.50
03/14/2019	IDS	CO	Review notice of Errata.	0.20	675.00	\$135.00
03/19/2019	IDS	CO	Revise stipulation to correct claim form.	0.40	675.00	\$270.00
03/20/2019	IDS	CO	Review claims # 17.	0.30	675.00	\$202.50
03/20/2019	IDS	CO	Review and revise POC form.	0.30	675.00	\$202.50
03/25/2019	IDS	CO	Review SHF claim.	0.70	675.00	\$472.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/26/2019	IDS	CO	Review documents and legal standards regarding vicarious liability; respondea and superior; SHF liability in New Mexico.	2.40	675.00	\$1,620.00
03/27/2019	JIS	CO	Review emails and case law on indemnification and contribution under New Mexico law.	0.70	675.00	\$472.50
				5.70		\$3,847.50

General Creditors Comm. [B150]

03/06/2019	JIS	GC	Telephone conferences regarding status of bylaws.	0.30	675.00	\$202.50
03/11/2019	IDS	GC	Email to Jim Stang regarding bylaws.	0.10	675.00	\$67.50
03/11/2019	IDS	GC	Email to Committee regarding bylaws.	0.10	675.00	\$67.50
03/11/2019	IDS	GC	Email to D. Hinojosa bylaws.	0.10	675.00	\$67.50
03/18/2019	JIS	GC	Telephone conference with Bruce Anderson POC, document production, mediators.	0.80	675.00	\$540.00
03/19/2019	JIS	GC	Call with B. Hall, L. Monagle, L. Ford regarding bar date, production of documents, confidentiality, allocations.	1.10	675.00	\$742.50
03/19/2019	JIS	GC	Review confidentiality agreement and draft agenda for 3/20 meeting.	0.30	675.00	\$202.50
03/20/2019	JIS	GC	Review phone log for "800" number. and return two calls.	0.20	675.00	\$135.00
03/20/2019	JIS	GC	Committee meeting: discovery, mediation, bar date and litigation update.	1.10	675.00	\$742.50
03/20/2019	IDS	GC	Memo regarding pending motions.	1.40	675.00	\$945.00
03/20/2019	IDS	GC	Attend committee call.	1.00	675.00	\$675.00
03/26/2019	JIS	GC	Telephone conference regarding bar date, discovery and mediation.	0.80	675.00	\$540.00
03/26/2019	JIS	GC	Telephone conference with B. Anderson regarding discovery and mandatory reporting issues.	0.20	675.00	\$135.00
03/27/2019	JIS	GC	Telephone conference with media regarding case status.	0.40	675.00	\$270.00
03/27/2019	JIS	GC	Email to Committee regarding meeting.	0.10	675.00	\$67.50
03/27/2019	JIS	GC	Telephone conference with Tamaki Group regarding case status.	0.80	675.00	\$540.00
03/27/2019	JIS	GC	Telephone conference with Brad Hall regarding bar date and discovery issues.	0.80	675.00	\$540.00
03/28/2019	JIS	GC	Telephone conference with Paul Linnenburger and KC Manierre regarding case status (bar date,	1.00	675.00	\$675.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			mediation, discovery, confidentiality).			
03/28/2019	JIS	GC	Telephone conference with F. Elsaesser and B. Anderson regarding confidentiality and estate causes of action.	0.90	675.00	\$607.50
				11.50		\$7,762.50

Hearing

03/07/2019	IDS	HE	Prepare for hearing.	1.00	675.00	\$675.00
03/07/2019	IDS	HE	Attend hearing.	0.80	675.00	\$540.00
03/07/2019	IDS	HE	Review revised order.	0.20	675.00	\$135.00
03/07/2019	IDS	HE	Email memo to Committee regarding hearing and bar date.	0.40	675.00	\$270.00
03/07/2019	IDS	HE	Telephone conference with Jim Stang regarding hearing and bar date.	0.20	675.00	\$135.00
				2.60		\$1,755.00

Insurance Coverage

03/06/2019	IAWN	IC	Review policies numbers and premiums and compare to list (1.2), exchange emails with Keane re same (.1)	1.30	675.00	\$877.50
03/12/2019	IAWN	IC	Exchanged emails with James I Stang re settlement agreements	0.10	675.00	\$67.50
03/13/2019	IAWN	IC	Started review of settlement agreements	2.00	675.00	\$1,350.00
03/14/2019	IAWN	IC	Reviewed settlement agreements	2.50	675.00	\$1,687.50
03/15/2019	IAWN	IC	Office conference with James I Stang re settlement agreements and potential impacts	0.60	675.00	\$405.00
03/16/2019	IAWN	IC	Further office conference with James I Stang re settlement agreements and potential impacts	0.30	675.00	\$202.50
03/16/2019	IAWN	IC	Review emails from James I Stang re same	0.10	675.00	\$67.50
03/16/2019	JIS	IC	Conference with I, Nasatir regarding insurance settlements.	0.50	675.00	\$337.50
03/18/2019	IAWN	IC	Review James I Stang emails to Anderson re Murray	0.10	675.00	\$67.50
03/18/2019	JIS	IC	Office conference with I. Nasatir regarding the scope of settlement agreements.	0.20	675.00	\$135.00
03/19/2019	IAWN	IC	Worked on chart to demonstrate settlements' impact	2.60	675.00	\$1,755.00
03/20/2019	IAWN	IC	Further revisions on chart, further review and analysis of settlement agreements' coverage of occurrence and application to future claims, review	3.80	675.00	\$2,565.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			boiler, new case re channeling issues, forward same to James I Stang			
03/22/2019	JIS	IC	Research regarding third party beneficiary status under insurance policies for analysis of settlement agreements.	1.00	675.00	\$675.00
03/25/2019	IAWN	IC	Exchange emails with Murray re telephone call	0.10	675.00	\$67.50
03/26/2019	IAWN	IC	Review and analyze third party rights v.v. insurance contracts under N.M. insurance law, case law and treatises, review James I Stang emails re same	2.50	675.00	\$1,687.50
03/27/2019	IAWN	IC	Further revisions to settlement chart	0.80	675.00	\$540.00
03/27/2019	IAWN	IC	Prepare for call with Murray	1.00	675.00	\$675.00
03/28/2019	IAWN	IC	Telephone conference with Murray re settlements	0.60	675.00	\$405.00
03/28/2019	IAWN	IC	Revise settlement chart	0.60	675.00	\$405.00
03/29/2019	IAWN	IC	Drafted and sent email discussing telephone call with Murray to James I Stang, review James I Stang response	0.30	675.00	\$202.50
				21.00		\$14,175.00

Plan & Disclosure Stmt. [B320]

03/20/2019	IDS	PD	Emails with SCC regarding allocation plans.	0.80	675.00	\$540.00
				0.80		\$540.00

Stay Litigation [B140]

03/20/2019	JIS	SL	Review pending motions for stay relief/complaints.	0.60	675.00	\$405.00
03/20/2019	IDS	SL	Review pleadings regarding Father Paichattu stay relief and AVP.	1.80	675.00	\$1,215.00
03/20/2019	IDS	SL	Review pleadings regarding C. Romero motion for stay relief.	2.40	675.00	\$1,620.00
03/20/2019	IDS	SL	Review JW motion for stay relief.	0.40	675.00	\$270.00
03/20/2019	IDS	SL	Review John Doe motion for stay relief and AVP.	1.20	675.00	\$810.00
03/27/2019	IDS	SL	Review state law (New Mexico) mandatory reporting statutes.	0.50	675.00	\$337.50
				6.90		\$4,657.50

TOTAL SERVICES FOR THIS MATTER:

\$42,255.00

Pachulski Stang Ziehl & Jones LLP
Archdiocese of Santa Fe O.C.C.
05066 - 00002

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March 31, 2019

Expenses

03/07/2019 RE2 SCAN/COPY (8 @0.10 PER PG)

0.80

Total Expenses for this Matter

\$0.80

REMITTANCE ADVICE

Please include this Remittance with your payment

For current services rendered through: 03/31/2019

Total Fees \$42,255.00

Total Expenses 0.80

Total Due on Current Invoice \$42,255.80

Outstanding Balance from prior invoices as of 03/31/2019 (May not include recent payments)

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
122014	01/01/2019	\$4,942.50	\$322.75	\$5,265.25
122016	01/31/2019	\$58,252.50	\$1,970.37	\$60,222.87
122027	02/28/2019	\$30,157.50	\$277.50	\$30,435.00

Total Amount Due on Current and Prior Invoices: \$138,178.92

Pachulski Stang Ziehl & Jones LLP

10100 Santa Monica Blvd.
13th Floor
Los Angeles, CA 90067

April 30, 2019

Invoice 123009

Client 05066

Matter 00002

JIS

JIS

RE: Committee Representation

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 04/30/2019

FEES	\$26,220.00
EXPENSES	\$578.73
TOTAL CURRENT CHARGES	\$26,798.73
BALANCE FORWARD	\$138,531.42
TOTAL BALANCE DUE	\$165,330.15

Summary of Services by Professional

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
DHH	Hinojosa, Diane H.	Other	150.00	2.00	\$300.00
IAWN	Nasatir, Iain A. W.	Partner	675.00	4.50	\$3,037.50
IDS	Scharf, Ilan D.	Partner	675.00	20.40	\$13,770.00
JIS	Stang, James I.	Partner	675.00	13.50	\$9,112.50
				<hr/> 40.40	<hr/> \$26,220.00

Summary of Services by Task Code

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AA	Asset Analysis/Recovery[B120]	15.80	\$10,665.00
BL	Bankruptcy Litigation [L430]	1.00	\$675.00
CA	Case Administration [B110]	0.50	\$337.50
CO	Claims Admin/Objections[B310]	8.50	\$4,687.50
CP	Compensation Prof. [B160]	0.80	\$540.00
FN	Financing [B230]	0.40	\$270.00
GC	General Creditors Comm. [B150]	6.50	\$4,387.50
IC	Insurance Coverage	4.70	\$3,172.50
OP	Operations [B210]	1.80	\$1,215.00
PD	Plan & Disclosure Stmt. [B320]	0.40	\$270.00
		40.40	<hr/> \$26,220.00

Pachulski Stang Ziehl & Jones LLP
Archdiocese of Santa Fe O.C.C.
05066 - 00002

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Invoice 123009
April 30, 2019

Summary of Expenses

<u>Description</u>	<u>Amount</u>
Conference Call [E105]	\$276.43
Pacer - Court Research	\$301.10
Reproduction/ Scan Copy	\$1.20
	<hr/>
	\$578.73

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Asset Analysis/Recovery[B120]						
04/01/2019	IDS	AA	Review pending document requests.	0.70	675.00	\$472.50
04/01/2019	IDS	AA	Respond to B Anderson regarding pending document requests.	0.20	675.00	\$135.00
04/03/2019	JIS	AA	Review Debtor's markup of confidentiality agreement.	0.30	675.00	\$202.50
04/03/2019	IDS	AA	Telephone conference with debtors counsel regarding confidentiality, discovery.	0.80	675.00	\$540.00
04/03/2019	IDS	AA	Telephone conference with Jim Stang regarding confidentiality.	0.20	675.00	\$135.00
04/05/2019	IDS	AA	Telephone conference with SCC regarding confidentiality.	1.00	675.00	\$675.00
04/08/2019	JIS	AA	Conference call with State Court Counsel regarding confidentiality agreement on discovery.	1.60	675.00	\$1,080.00
04/08/2019	JIS	AA	Conference call with Debtor regarding confidentiality agreement regarding documents.	1.30	675.00	\$877.50
04/08/2019	JIS	AA	Draft email regarding Abuse Document for State Court Counsel consideration.	0.60	675.00	\$405.00
04/08/2019	IDS	AA	Call with SCC regarding confidentiality and document production.	1.60	675.00	\$1,080.00
04/08/2019	IDS	AA	Call with debtors' counsel and SCC regarding confidentiality and discovery.	1.30	675.00	\$877.50
04/09/2019	JIS	AA	Telephone conference with State Court Counsel regarding abuse documents (.5) and redraft proposal regarding production of abuse documents (.4).	0.90	675.00	\$607.50
04/16/2019	JIS	AA	Review ADSF response to abuse document section.	0.40	675.00	\$270.00
04/16/2019	JIS	AA	Telephone conference with State Court Counsel regarding abuse document production.	0.70	675.00	\$472.50
04/16/2019	JIS	AA	Draft email response to F. Elsaesser letter regarding abuse proposal.	0.40	675.00	\$270.00
04/16/2019	IDS	AA	Work on confidentiality/document procedures.	0.40	675.00	\$270.00
04/18/2019	JIS	AA	Research on firms regarding redaction services.	0.30	675.00	\$202.50
04/24/2019	JIS	AA	Review\revise confidentiality agreement (.9) and telephone conference with B. Anderson regarding same (.1).	1.00	675.00	\$675.00
04/29/2019	JIS	AA	Final check on confidentiality agreement; telephone conference with B. Anderson regarding same and circulate to Committee chair for signature.	0.20	675.00	\$135.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/29/2019	JIS	AA	Review confidentiality comments from State Court Counsel and email to Debtor regarding same.	0.20	675.00	\$135.00
04/29/2019	IDS	AA	Review confidentiality agreement.	0.50	675.00	\$337.50
04/29/2019	IDS	AA	Email to Jim Stang regarding confidentiality agreement.	0.20	675.00	\$135.00
04/30/2019	JIS	AA	Telephone conference with B. Anderson regarding changes to confidentiality agreement (.2); telephone conference with C. Manierre regarding confidentiality agreement (.1); telephone conference with B. Hall regarding confidentiality agreement and claims (.7).	1.00	675.00	\$675.00
				<u>15.80</u>		<u>\$10,665.00</u>

Bankruptcy Litigation [L430]

04/01/2019	IDS	BL	Review motion for exclusivity extension.	0.70	675.00	\$472.50
04/01/2019	IDS	BL	Email to Jim Stang regarding motion for exclusivity extension	0.20	675.00	\$135.00
04/02/2019	JIS	BL	Telephone conference with I. Scharf regarding retention of counsel by Debtor in adversary proceeding.	0.10	675.00	\$67.50
				<u>1.00</u>		<u>\$675.00</u>

Case Administration [B110]

04/03/2019	IDS	CA	Follow up regarding bylaws.	0.20	675.00	\$135.00
04/18/2019	IDS	CA	Telephone conference with Jim Stang regarding status conference.	0.30	675.00	\$202.50
				<u>0.50</u>		<u>\$337.50</u>

Claims Admin/Objections[B310]

04/01/2019	IDS	CO	Email to Jim Stang regarding additional claimants.	0.20	675.00	\$135.00
04/01/2019	IDS	CO	Attend to permitted party confidentiality agreement	0.20	675.00	\$135.00
04/01/2019	IDS	CO	Revise permitted party confidentiality form.	0.40	675.00	\$270.00
04/01/2019	IDS	CO	Review bar date order regarding confidentiality.	0.40	675.00	\$270.00
04/01/2019	IDS	CO	Email to debtor's counsel regarding permitted party confidentiality agreement.	0.20	675.00	\$135.00
04/02/2019	IDS	CO	Correct POC form.	0.40	675.00	\$270.00
04/02/2019	IDS	CO	Review POC form, notices regarding corrections.	0.80	675.00	\$540.00
04/02/2019	IDS	CO	Respond to SCC request regarding corrected form.	0.30	675.00	\$202.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/02/2019	IDS	CO	Respond to claimant inquiry regarding POC form.	0.40	675.00	\$270.00
04/04/2019	IDS	CO	Review sexual abuse claims.	1.00	675.00	\$675.00
04/04/2019	IDS	CO	Draft chart regarding sexual abuse claims.	1.00	675.00	\$675.00
04/04/2019	IDS	CO	Emails with D. Hinojosa regarding sexual abuse analysis.	0.20	675.00	\$135.00
04/04/2019	IDS	CO	Telephone conference with D. Hinojosa regarding sexual abuse claims.	0.20	675.00	\$135.00
04/24/2019	IDS	CO	Review new claims.	0.80	675.00	\$540.00
04/26/2019	DHH	CO	Update All Claims, Claimant Address and Claims Summary charts regarding claims 1-10; redact claims 1-10.	2.00	150.00	\$300.00
				8.50		\$4,687.50

Compensation Prof. [B160]

04/23/2019	IDS	CP	Revise invoices for fee application.	0.80	675.00	\$540.00
				0.80		\$540.00

Financing [B230]

04/01/2019	IDS	FN	Review amended MOR.	0.40	675.00	\$270.00
				0.40		\$270.00

General Creditors Comm. [B150]

04/01/2019	IDS	GC	Draft proposed agenda for committee meeting.	0.30	675.00	\$202.50
04/02/2019	JIS	GC	Draft agenda and memo to committee regarding pending matters.	0.50	675.00	\$337.50
04/02/2019	IDS	GC	Committee call	1.00	675.00	\$675.00
04/03/2019	JIS	GC	Telephone conference with B. Anderson regarding mediation, discovery, confidentiality agreement and filed claims.	0.60	675.00	\$405.00
04/03/2019	JIS	GC	Attend committee call.	0.80	675.00	\$540.00
04/03/2019	IDS	GC	Follow up with committee regarding confidentiality, discovery.	0.30	675.00	\$202.50
04/08/2019	JIS	GC	Telephone conference with John Doe regarding case status.	0.30	675.00	\$202.50
04/08/2019	JIS	GC	Telephone conference with B. Smith regarding case status.	0.30	675.00	\$202.50
04/10/2019	JIS	GC	Telephone conference with survivor who called on	1.00	675.00	\$675.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
			hotline.			
04/17/2019	IDS	GC	Attend to inadvertent document disclosure.	1.00	675.00	\$675.00
04/23/2019	JIS	GC	Telephone conference with I. Scharf regarding financial due diligence and mediator interview (.2); email to State Court Counsel regarding confidentiality (.2).	0.40	675.00	\$270.00
				6.50		\$4,387.50
Insurance Coverage						
04/01/2019	IAWN	IC	continued modifying settlement chart and reviewing settlements	1.70	675.00	\$1,147.50
04/01/2019	JIS	IC	Office conference with I. Nasatir regarding statute of limitations for avoidance action regarding insurance agreement.	0.20	675.00	\$135.00
04/29/2019	IAWN	IC	Office conference with James I Stang re policies (.3), exchange emails with Murray and Anderson re policies (0.5)	0.80	675.00	\$540.00
04/30/2019	IAWN	IC	Exchange emails with Anderson's office and James I Stang re policies	2.00	675.00	\$1,350.00
				4.70		\$3,172.50
Operations [B210]						
04/24/2019	IDS	OP	Review March MOR	1.80	675.00	\$1,215.00
				1.80		\$1,215.00
Plan & Disclosure Stmt. [B320]						
04/02/2019	JIS	PD	Review mediator emails for memo to Committee and call to B. Anderson regarding same.	0.10	675.00	\$67.50
04/15/2019	JIS	PD	Telephone conference with F. Elsaesser regarding mediation.	0.30	675.00	\$202.50
				0.40		\$270.00
TOTAL SERVICES FOR THIS MATTER:						\$26,220.00

Expenses

02/13/2019	CC	Conference Call [E105] Loop Up, JIS	0.28
02/13/2019	CC	Conference Call [E105] Loop Up, JIS	0.14
02/13/2019	CC	Conference Call [E105] Loop Up, JIS	39.63
02/14/2019	CC	Conference Call [E105] Loop Up, JIS	15.72
02/20/2019	CC	Conference Call [E105] Loop Up, JIS	0.23
02/20/2019	CC	Conference Call [E105] Loop Up, JIS	0.45
02/20/2019	CC	Conference Call [E105] Loop Up, JIS	0.08
02/27/2019	CC	Conference Call [E105] Loop Up, JIS	26.85
02/27/2019	CC	Conference Call [E105] Loop Up, JIS	0.07
02/27/2019	CC	Conference Call [E105] Loop Up, JIS	41.25
04/03/2019	CC	Conference Call [E105] Loop Up, JIS	51.01
04/03/2019	RE2	SCAN/COPY (2 @0.10 PER PG)	0.20
04/08/2019	CC	Conference Call [E105] Loop Up, JIS	42.28
04/08/2019	CC	Conference Call [E105] Loop Up, JIS	0.22
04/08/2019	CC	Conference Call [E105] Loop Up, JIS	0.07
04/08/2019	CC	Conference Call [E105] Loop Up, JIS	0.63
04/08/2019	CC	Conference Call [E105] Loop Up, JIS	46.85

Pachulski Stang Ziehl & Jones LLP
Archdiocese of Santa Fe O.C.C.
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04/10/2019	CC	Conference Call [E105] Loop Up, JIS	0.63
04/16/2019	CC	Conference Call [E105] Loop Up, JIS	9.59
04/24/2019	CC	Conference Call [E105] Loop Up, JIS	0.45
04/24/2019	RE2	SCAN/COPY (10 @0.10 PER PG)	1.00
04/30/2019	PAC	Pacer - Court Research	301.10
Total Expenses for this Matter			\$578.73

REMITTANCE ADVICE

Please include this Remittance with your payment

For current services rendered through: 04/30/2019

Total Fees \$26,220.00

Total Expenses 578.73

Total Due on Current Invoice \$26,798.73

Outstanding Balance from prior invoices as of 04/30/2019 (May not include recent payments)

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
122014	01/01/2019	\$4,942.50	\$322.75	\$5,265.25
122027	02/28/2019	\$30,157.50	\$277.50	\$30,435.00
122029	03/31/2019	\$42,255.00	\$0.80	\$42,255.80
122274	01/31/2019	\$58,605.00	\$1,970.37	\$60,575.37

Total Amount Due on Current and Prior Invoices: \$165,330.15

Pachulski Stang Ziehl & Jones LLP

10100 Santa Monica Blvd.
13th Floor
Los Angeles, CA 90067

May 31, 2019

Invoice 123014

Client 05066

Matter 00002

JIS

JIS

RE: Committee Representation

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 05/31/2019

FEES	\$10,110.00
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EXPENSES	\$106.52
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TOTAL CURRENT CHARGES	\$10,216.52
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BALANCE FORWARD	\$165,330.15
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TOTAL BALANCE DUE	\$175,546.67
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Summary of Services by Professional

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
DHH	Hinojosa, Diane H.	Other	150.00	6.20	\$930.00
IAWN	Nasatir, Iain A. W.	Partner	675.00	0.30	\$202.50
IDS	Scharf, Ilan D.	Partner	675.00	4.20	\$2,835.00
JIS	Stang, James I.	Partner	675.00	6.10	\$4,117.50
SEG	Goldich, Stanley E.	Partner	675.00	3.00	\$2,025.00
				19.80	\$10,110.00

Summary of Services by Task Code

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AA	Asset Analysis/Recovery[B120]	1.90	\$1,282.50
CA	Case Administration [B110]	0.50	\$337.50
CO	Claims Admin/Objections[B310]	7.20	\$1,605.00
GC	General Creditors Comm. [B150]	5.20	\$3,510.00
IC	Insurance Coverage	0.30	\$202.50
PC	PSZ&J Compensation	0.20	\$135.00
PD	Plan & Disclosure Stmt. [B320]	0.90	\$607.50
RP	Retention of Prof. [B160]	3.60	\$2,430.00
		19.80	<hr/> \$10,110.00

Pachulski Stang Ziehl & Jones LLP
Archdiocese of Santa Fe O.C.C.
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Summary of Expenses

<u>Description</u>	<u>Amount</u>
Conference Call [E105]	\$0.22
Pacer - Court Research	\$105.10
Reproduction/ Scan Copy	\$1.20
	<hr/>
	\$106.52

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Asset Analysis/Recovery[B120]						
05/14/2019	JIS	AA	Telephone conference with Debtor and Tamaki regarding access to discovery.	0.60	675.00	\$405.00
05/21/2019	IDS	AA	Initial review of documents produced by debtor	1.00	675.00	\$675.00
05/29/2019	JIS	AA	Forward document productions to committee and counsel.	0.30	675.00	\$202.50
				1.90		\$1,282.50
Case Administration [B110]						
05/29/2019	JIS	CA	Telephone call with Ilan Scharf regarding mediator selection, claims review, document review.	0.30	675.00	\$202.50
05/29/2019	JIS	CA	Telephone call Bruce Anderson regarding mediator, claims and document review.	0.20	675.00	\$135.00
				0.50		\$337.50
Claims Admin/Objections[B310]						
05/13/2019	JIS	CO	Review memo regarding accrual of claims.	0.60	675.00	\$405.00
05/15/2019	JIS	CO	Telephone conference with I. Scharf regarding claims and charting.	0.20	675.00	\$135.00
05/15/2019	DHH	CO	Update All Claims, Claimant Address and Claims Summary charts regarding claims 11-25; redact claims 11-25.	3.00	150.00	\$450.00
05/20/2019	JIS	CO	Telephone conference with Brad Hall regarding chapter 7 issues.	0.10	675.00	\$67.50
05/28/2019	DHH	CO	Complete redaction of claims.	3.20	150.00	\$480.00
05/29/2019	JIS	CO	Telephone call with state court counsel regarding non sexual abuse claim form.	0.10	675.00	\$67.50
				7.20		\$1,605.00
General Creditors Comm. [B150]						
05/01/2019	IDS	GC	Telephone conference with M. Simpson regarding status of chapter 11 case	0.40	675.00	\$270.00
05/13/2019	JIS	GC	Telephone conference with Abuse Survivor re status of case.	0.50	675.00	\$337.50
05/13/2019	IDS	GC	Review email from B. Hall regarding ch. 7 cases; email to James I. Stang regarding same	0.40	675.00	\$270.00
05/14/2019	IDS	GC	Call with plaintiffs' counsel regarding case status	0.80	675.00	\$540.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/14/2019	IDS	GC	Review documents regarding ch. 7 cases	0.40	675.00	\$270.00
05/15/2019	JIS	GC	Telephone conference with abuse survivor re case status.	0.40	675.00	\$270.00
05/15/2019	JIS	GC	Telephone conference with survivor re case status.	0.50	675.00	\$337.50
05/16/2019	JIS	GC	Telephone conference with survivor re case status.	0.50	675.00	\$337.50
05/21/2019	IDS	GC	Review memo for B. Hall to E. Mazel regarding ch. 7 issues	1.00	675.00	\$675.00
05/28/2019	JIS	GC	Telephone call survivor regarding case status.	0.30	675.00	\$202.50
				5.20		\$3,510.00

Insurance Coverage

05/23/2019	IAWN	IC	Reviewed emails re drop box production to UCC, telephone conferences with IT and Janice G Washington	0.20	675.00	\$135.00
05/28/2019	IAWN	IC	Exchange emails with Murray re telephone conference on settlements	0.10	675.00	\$67.50
				0.30		\$202.50

PSZ&J Compensation

05/21/2019	IDS	PC	Email to James I. Stang regarding PSZJ invoices	0.20	675.00	\$135.00
				0.20		\$135.00

Plan & Disclosure Stmt. [B320]

05/13/2019	JIS	PD	Telephone conference with B. Hall regarding chapter 7 issues (.4); review Iowa precedent and prepare memo re same to B. Hall (.4).	0.80	675.00	\$540.00
05/16/2019	JIS	PD	Telephone conference with FE regarding mediation candidate and discovery.	0.10	675.00	\$67.50
				0.90		\$607.50

Retention of Prof. [B160]

05/01/2019	SEG	RP	Review James I. Stang email re disclosure issues re new representation and research issues and ethics rules and preparation of email memo to James I. Stang and Ilan D. Scharf re same .	2.00	675.00	\$1,350.00
05/05/2019	SEG	RP	Review James I. Stang email re BSA ad hoc abuse survivor committee representative and Rule 2014 disclosure in Sante Fe Diocese and analysis of issues and email to James I. Stang re same.	0.60	675.00	\$405.00

Pachulski Stang Ziehl & Jones LLP
Archdiocese of Santa Fe O.C.C.
05066 - 00002

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May 31, 2019

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/06/2019	JIS	RP	Draft and circulate supplemental employment declaration.	0.60	675.00	\$405.00
05/06/2019	SEG	RP	Review prior James I. Stang emails re information re BSA abuse claims relating to diocese priests and emails to James I. Stang and review James I. Stang email re same.	0.40	675.00	\$270.00
				<hr/> 3.60		<hr/> \$2,430.00

TOTAL SERVICES FOR THIS MATTER:

\$10,110.00

Expenses

05/01/2019	RE2	SCAN/COPY (6 @0.10 PER PG)	0.60
05/01/2019	RE2	SCAN/COPY (6 @0.10 PER PG)	0.60
05/15/2019	CC	Conference Call [E105] Loop Up, JIS	0.22
05/31/2019	PAC	Pacer - Court Research	105.10
Total Expenses for this Matter			\$106.52

REMITTANCE ADVICE

Please include this Remittance with your payment

For current services rendered through: 05/31/2019

Total Fees \$10,110.00

Total Expenses 106.52

Total Due on Current Invoice \$10,216.52

Outstanding Balance from prior invoices as of 05/31/2019 (May not include recent payments)

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
122014	01/01/2019	\$4,942.50	\$322.75	\$5,265.25
122027	02/28/2019	\$30,157.50	\$277.50	\$30,435.00
122029	03/31/2019	\$42,255.00	\$0.80	\$42,255.80
122274	01/31/2019	\$58,605.00	\$1,970.37	\$60,575.37
123009	04/30/2019	\$26,220.00	\$578.73	\$26,798.73

Total Amount Due on Current and Prior Invoices: \$175,546.67

Pachulski Stang Ziehl & Jones LLP

10100 Santa Monica Blvd.
13th Floor
Los Angeles, CA 90067

June 30, 2019

JIS

Invoice 123021

Client 05066

Matter 00002

JIS

RE: Committee Representation

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 06/30/2019

FEES	\$76,215.00
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EXPENSES	\$1,864.39
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TOTAL CURRENT CHARGES	\$78,079.39
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BALANCE FORWARD	\$175,546.67
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TOTAL BALANCE DUE	\$253,626.06
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Summary of Services by Professional

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
DHH	Hinojosa, Diane H.	Other	150.00	22.10	\$3,315.00
IAWN	Nasatir, Iain A. W.	Partner	675.00	31.80	\$21,465.00
IDS	Scharf, Ilan D.	Partner	675.00	48.80	\$32,940.00
JIS	Stang, James I.	Partner	675.00	27.40	\$18,495.00
				<hr/> 130.10	<hr/> \$76,215.00

Summary of Services by Task Code

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AA	Asset Analysis/Recovery[B120]	14.50	\$9,787.50
CA	Case Administration [B110]	0.20	\$135.00
CO	Claims Admin/Objections[B310]	65.90	\$32,880.00
CP	Compensation Prof. [B160]	0.80	\$540.00
GC	General Creditors Comm. [B150]	14.60	\$9,855.00
IC	Insurance Coverage	33.90	\$22,882.50
PD	Plan & Disclosure Stmt. [B320]	0.20	\$135.00
		130.10	<hr/> \$76,215.00

Summary of Expenses

<u>Description</u>	<u>Amount</u>
Air Fare [E110]	\$1,021.60
Working Meals [E111]	\$560.71
Conference Call [E105]	\$39.43
Legal Vision Atty Mess Service	\$67.40
Pacer - Court Research	\$43.50
Postage [E108]	\$7.20
Reproduction Expense [E101]	\$42.20
Travel Expense [E110]	\$82.35
	<hr/>
	\$1,864.39

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Asset Analysis/Recovery[B120]						
06/03/2019	JIS	AA	Review May 21 production of documents, update supplementary request, draft email to Debtor re annotated production index and telephone calls to Rob Charles and Paul Fish regarding production from affiliates.	5.20	675.00	\$3,510.00
06/03/2019	IDS	AA	Review James I. Stang email regarding discovery	0.30	675.00	\$202.50
06/04/2019	JIS	AA	Telephone call with Paul Fish re follow up to Debtor's response on informal discovery requests.	0.30	675.00	\$202.50
06/04/2019	JIS	AA	Telephone call with Lisa Ford re follow up to Debtor document production.	0.80	675.00	\$540.00
06/04/2019	JIS	AA	Edit emails regarding additional document request and review of request no. 2.	1.20	675.00	\$810.00
06/04/2019	JIS	AA	Draft discovery requests for Cemetery, DLF and update request for Archdiocese.	1.20	675.00	\$810.00
06/07/2019	JIS	AA	Prepare document requests for Cemetery Association and Deposit and Loan Fund.	0.60	675.00	\$405.00
06/18/2019	JIS	AA	Review emails to Rob Charles regarding discovery and email response re confidentiality and production.	0.50	675.00	\$337.50
06/24/2019	JIS	AA	Review and reply to email regarding Archdiocese funds in DLF account.	0.10	675.00	\$67.50
06/24/2019	JIS	AA	Research for Rule 2004 examination of The Catholic Foundation.	0.70	675.00	\$472.50
06/25/2019	JIS	AA	Review email re real property review and send to counsel.	0.40	675.00	\$270.00
06/25/2019	JIS	AA	Draft and revise Catholic Foundation Rule 2004 exam application.	3.00	675.00	\$2,025.00
06/28/2019	JIS	AA	Telephone call to reporter re Rule 2004 exam.	0.20	675.00	\$135.00
				14.50		\$9,787.50
Case Administration [B110]						
06/04/2019	JIS	CA	Telephone call Bruce Anderson re document request and mediator.	0.20	675.00	\$135.00
				0.20		\$135.00
Claims Admin/Objections[B310]						
06/04/2019	IDS	CO	Initial review of claims	2.80	675.00	\$1,890.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/05/2019	JIS	CO	Review and email redacted claims chart to committee and counsel.	0.10	675.00	\$67.50
06/05/2019	IDS	CO	Continue claims analysis/ review	2.30	675.00	\$1,552.50
06/07/2019	IDS	CO	Continue claims analysis	2.30	675.00	\$1,552.50
06/11/2019	JIS	CO	Telephone call with two survivors re clams filing process (.6); emails regarding ML claim and telephone call with Brad Hall re same (.4).	1.00	675.00	\$675.00
06/11/2019	IDS	CO	Email to S. Schoeffer regarding claims	0.20	675.00	\$135.00
06/11/2019	IDS	CO	Review additional claims	4.10	675.00	\$2,767.50
06/12/2019	IDS	CO	Prepare initial claims report (for claims filed to date)	1.40	675.00	\$945.00
06/12/2019	IDS	CO	Follow up regarding discrepancies in filed claims (1.5); telephone conference with B. Hall regarding same (.3)	1.80	675.00	\$1,215.00
06/13/2019	IDS	CO	Review Paraclese claim; email to James I. Stang regarding same	0.60	675.00	\$405.00
06/17/2019	IDS	CO	Continue claims review and analysis	2.20	675.00	\$1,485.00
06/18/2019	IDS	CO	Telephone conference with James I. Stang regarding mediator; claims	0.40	675.00	\$270.00
06/18/2019	IDS	CO	Review claims spreadsheet	0.80	675.00	\$540.00
06/18/2019	IDS	CO	Continue claims review/ analysis	1.80	675.00	\$1,215.00
06/19/2019	IDS	CO	Revise claims chart/ update	1.30	675.00	\$877.50
06/20/2019	DHH	CO	Update All Claims and Claimant Address charts regarding claims 26-61.	3.00	150.00	\$450.00
06/20/2019	IDS	CO	Call with Rothstein firm regarding status of case	0.80	675.00	\$540.00
06/20/2019	IDS	CO	Continue claims analysis	3.80	675.00	\$2,565.00
06/21/2019	IDS	CO	Continue claims analysis	1.80	675.00	\$1,215.00
06/24/2019	DHH	CO	Update All Claims and Claimant Address charts regarding claims 62-170.	6.00	150.00	\$900.00
06/24/2019	DHH	CO	Review claims to update Claims Summary chart regarding claims 320-347.	4.30	150.00	\$645.00
06/24/2019	IDS	CO	Continue claims review/ analysis	2.70	675.00	\$1,822.50
06/25/2019	DHH	CO	Update All Claims and Claimant Address charts regarding claims 171-238.	3.80	150.00	\$570.00
06/25/2019	DHH	CO	Review claims to update Claims Summary chart regarding claims 348-374.	5.00	150.00	\$750.00
06/26/2019	JIS	CO	Telephone call with Ilan Scharf regarding claims chart.	0.30	675.00	\$202.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/26/2019	IDS	CO	Continue claims review/ analysis	4.80	675.00	\$3,240.00
06/27/2019	IDS	CO	Initial claims analysis chart to SCC	2.40	675.00	\$1,620.00
06/27/2019	IDS	CO	Email to B. Hall regarding claims	0.40	675.00	\$270.00
06/27/2019	IDS	CO	Email to Stephanie regarding claims	0.40	675.00	\$270.00
06/27/2019	IDS	CO	Review claims regarding numbering/ confusion	1.00	675.00	\$675.00
06/28/2019	JIS	CO	Telephone call from Bruce Anderson regarding priests in proofs of claim and telephone call with L. Monagle re same.	0.50	675.00	\$337.50
06/28/2019	IDS	CO	Update claims chart	1.80	675.00	\$1,215.00
				65.90		\$32,880.00

Compensation Prof. [B160]

06/04/2019	IDS	CP	Revise PSZJ invoices	0.80	675.00	\$540.00
				0.80		\$540.00

General Creditors Comm. [B150]

06/04/2019	JIS	GC	Draft agenda for June 5 meeting.	0.70	675.00	\$472.50
06/05/2019	JIS	GC	Prepare for and attend committee meeting.	1.20	675.00	\$810.00
06/06/2019	IDS	GC	Telephone conference with C. Vernon regarding case status	0.80	675.00	\$540.00
06/18/2019	JIS	GC	Telephone call with Dan Fasy and Bryan Smith re case status.	0.50	675.00	\$337.50
06/18/2019	JIS	GC	Meeting with State Court Counsel re claims and reorganization issues.	5.50	675.00	\$3,712.50
06/18/2019	IDS	GC	Prepare for meeting with state court counsel	0.40	675.00	\$270.00
06/18/2019	IDS	GC	Meet with James I. Stang, IAWN, state court counsel regarding claims analysis mediator, case game plan	4.00	675.00	\$2,700.00
06/20/2019	JIS	GC	Telephone conference with L. James and B. Smith regarding counsel meeting.	0.10	675.00	\$67.50
06/20/2019	JIS	GC	Telephone call with Ilan Scharf with update on call with state court counsel re case status.	0.30	675.00	\$202.50
06/25/2019	JIS	GC	Status report to committee.	0.50	675.00	\$337.50
06/26/2019	IDS	GC	Email with B. Hall regarding meeting	0.20	675.00	\$135.00
06/26/2019	IDS	GC	Email with committee regarding meeting	0.20	675.00	\$135.00
06/27/2019	IDS	GC	Follow up with committee regarding meeting	0.20	675.00	\$135.00

				14.60		\$9,855.00
Insurance Coverage						
06/03/2019	IAWN	IC	Exchange emails with James I Stang re production, review virtual file room re same and confirm no additional insurance documents produced	0.90	675.00	\$607.50
06/04/2019	IAWN	IC	Telephone conference with James I Stangs re Murray call, exchange emails with Murray re same	0.20	675.00	\$135.00
06/04/2019	IAWN	IC	Review file re outstanding issues with insurance/Murray, draft agenda email for James I Stang, review same	1.80	675.00	\$1,215.00
06/04/2019	JIS	IC	Telephone call with I. Nasatir regarding insurance map and claims.	0.10	675.00	\$67.50
06/05/2019	IAWN	IC	Exchange emails with Murray re call	0.10	675.00	\$67.50
06/05/2019	IAWN	IC	Office conference with James I Stang and Lee re claims chart w/ modifications for insurance	0.10	675.00	\$67.50
06/05/2019	IAWN	IC	Review Lee emails re same with chart	0.10	675.00	\$67.50
06/06/2019	IAWN	IC	Exchange emails with Murray and James I Stang re call	0.10	675.00	\$67.50
06/07/2019	IAWN	IC	Review emails between Murray and James I Stang re call	0.10	675.00	\$67.50
06/10/2019	IAWN	IC	Exchange emails with James I Stang re progress on chart and research issue (.2); review James I Stang emails to Murray re call (.1); research settlement enforceability /third party beneficiary law in New Mexico and research from Gallup (2.0)	2.30	675.00	\$1,552.50
06/13/2019	IAWN	IC	Review emails re call between James I Stang and Elasser	0.10	675.00	\$67.50
06/14/2019	IAWN	IC	Review prior charts, analyze against current charting and claims	2.30	675.00	\$1,552.50
06/14/2019	IAWN	IC	Research direct right of action in New Mexico	1.00	675.00	\$675.00
06/17/2019	IAWN	IC	Worked on charts for insurance, review policies, revised charts, prepared presentation materials	4.70	675.00	\$3,172.50
06/17/2019	IAWN	IC	Telephone conference with diocese and James I Stang re insurance	1.00	675.00	\$675.00
06/17/2019	JIS	IC	Office conference with Iain Nasatir regarding insurance coverage for New Mexico claims.	0.70	675.00	\$472.50
06/17/2019	JIS	IC	Conference call with Debtor's counsel regarding insurance issues.	1.20	675.00	\$810.00
06/18/2019	IAWN	IC	Prepare for and attend meeting with state court counsel, presentation	10.00	675.00	\$6,750.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/23/2019	IAWN	IC	Review Ford email re insurance, review insurance policies, analyze, review case cited by Ford, analyze, draft length emails with analysis to Ford and James I Stang	3.80	675.00	\$2,565.00
06/24/2019	IAWN	IC	Telephone conference with James I Stang re Ford emails	0.10	675.00	\$67.50
06/24/2019	IAWN	IC	Review New Mexico occurrence cases and analyze against settlements and timing	2.20	675.00	\$1,485.00
06/24/2019	JIS	IC	Telephone call with Iain Nasatir regarding insurance policy interpretation.	0.10	675.00	\$67.50
06/25/2019	IAWN	IC	Review and analyze Ford email re insurance	0.30	675.00	\$202.50
06/25/2019	IAWN	IC	Review file, draft email to Murray re information needed	0.40	675.00	\$270.00
06/27/2019	IAWN	IC	Review Murray/Stang emails	0.10	675.00	\$67.50
06/28/2019	IAWN	IC	Review Murray Stang emails	0.10	675.00	\$67.50
				<u>33.90</u>		<u>\$22,882.50</u>

Plan & Disclosure Stmt. [B320]

06/26/2019	JIS	PD	Emails to State Court Counsel for July 24 meeting.	0.20	675.00	\$135.00
				<u>0.20</u>		<u>\$135.00</u>

TOTAL SERVICES FOR THIS MATTER:

\$76,215.00

Expenses

06/05/2019	CC	Conference Call [E105] Loop Up, JIS	39.43
06/18/2019	BM	Business Meal [E111] Nerano, working meal, JIS	560.71
06/18/2019	LV	Legal Vision Atty/Mess. Service- Inv. 06107, Clementine, N/A	67.40
06/26/2019	PO	05066.00002 :Postage Charges for 06-26-19	5.70
06/26/2019	PO	05066.00002 :Postage Charges for 06-26-19	1.50
06/26/2019	RE	(4 @0.20 PER PG)	0.80
06/26/2019	RE	(207 @0.20 PER PG)	41.40
06/27/2019	AF	Air Fare [E110] American Airlines, Tkt. 00173753486480, From LAX to ABQ to LAX, JIS	271.60
06/28/2019	AF	Air Fare [E110] Delta Airlines, Tkt#00623778085534, EWR to ABQ, ABQ to ATL, ATL to LGA, IDS	750.00
06/28/2019	TE	Travel Expense [E110] Travel Insurance, IDS	82.35
06/30/2019	PAC	Pacer - Court Research	43.50
Total Expenses for this Matter			\$1,864.39

REMITTANCE ADVICE

Please include this Remittance with your payment

For current services rendered through: 06/30/2019

Total Fees \$76,215.00

Total Expenses 1,864.39

Total Due on Current Invoice \$78,079.39

Outstanding Balance from prior invoices as of 06/30/2019 (May not include recent payments)

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
122014	01/01/2019	\$4,942.50	\$322.75	\$5,265.25
122027	02/28/2019	\$30,157.50	\$277.50	\$30,435.00
122029	03/31/2019	\$42,255.00	\$0.80	\$42,255.80
122274	01/31/2019	\$58,605.00	\$1,970.37	\$60,575.37
123009	04/30/2019	\$26,220.00	\$578.73	\$26,798.73
123014	05/31/2019	\$10,110.00	\$106.52	\$10,216.52

Total Amount Due on Current and Prior Invoices: \$253,626.06

Pachulski Stang Ziehl & Jones LLP

10100 Santa Monica Blvd.
13th Floor
Los Angeles, CA 90067

July 31, 2019

Invoice 123202

Client 05066

Matter 00002

JIS

JIS

RE: Committee Representation

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 07/31/2019

FEES	\$92,205.00
EXPENSES	\$4,995.56
TOTAL CURRENT CHARGES	\$97,200.56
BALANCE FORWARD	\$253,626.06
TOTAL BALANCE DUE	\$350,826.62

Summary of Services by Professional

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
IAWN	Nasatir, Iain A. W.	Partner	675.00	14.90	\$10,057.50
IDS	Scharf, Ilan D.	Partner	337.50	20.00	\$6,750.00
IDS	Scharf, Ilan D.	Partner	675.00	67.00	\$45,225.00
JIS	Stang, James I.	Partner	337.50	12.00	\$4,050.00
JIS	Stang, James I.	Partner	675.00	38.70	\$26,122.50
				152.60	\$92,205.00

Summary of Services by Task Code

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AA	Asset Analysis/Recovery[B120]	9.70	\$6,547.50
CO	Claims Admin/Objections[B310]	26.20	\$17,685.00
GC	General Creditors Comm. [B150]	57.20	\$38,610.00
HE	Hearing	1.20	\$810.00
IC	Insurance Coverage	19.60	\$13,230.00
PD	Plan & Disclosure Stmt. [B320]	6.70	\$4,522.50
TR	Travel	32.00	\$10,800.00
		152.60	<hr/> \$92,205.00

Summary of Expenses

<u>Description</u>	<u>Amount</u>
Air Fare [E110]	\$442.96
Auto Travel Expense [E109]	\$302.20
Conference Call [E105]	\$12.33
Federal Express [E108]	\$32.26
Hotel Expense [E110]	\$3,590.07
Outside Services	\$479.13
Pacer - Court Research	\$4.90
Reproduction/ Scan Copy	\$14.00
Travel Expense [E110]	\$117.71
	<hr/>
	\$4,995.56

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Asset Analysis/Recovery[B120]						
07/03/2019	JIS	AA	Review addendum to confidentiality agreement, email to R.Charles re same and forward to Committee.	0.40	675.00	\$270.00
07/03/2019	IDS	AA	Update/revise/ continue claims analysis.	2.30	675.00	\$1,552.50
07/08/2019	JIS	AA	Review addendum to confidentiality agreement, email to Committee chair for execution.	0.10	675.00	\$67.50
07/22/2019	JIS	AA	Review email from Paul Fish regarding Foundation discovery.	0.10	675.00	\$67.50
07/22/2019	JIS	AA	Telephone call with Tish Gilarda regarding Servants discovery.	0.10	675.00	\$67.50
07/22/2019	JIS	AA	Telephone call with Ilan Scharf regarding confidentiality agreements for other state court counsel.	0.10	675.00	\$67.50
07/22/2019	JIS	AA	Review Catholic Foundation response to Rule 2004 exam motion.	0.30	675.00	\$202.50
07/22/2019	IDS	AA	Work on SCC confidentiality agreement.	0.90	675.00	\$607.50
07/23/2019	JIS	AA	Inspect ABQ and Santa Fe real property.	3.50	675.00	\$2,362.50
07/30/2019	JIS	AA	Review Rule 2004 motion, opposition, email to Charles and Fish re status.	1.60	675.00	\$1,080.00
07/31/2019	JIS	AA	Review and reply to Paul Fish email regarding Foundation production.	0.30	675.00	\$202.50
				9.70		\$6,547.50

Claims Admin/Objections[B310]

07/01/2019	IDS	CO	Telephone call with state court counsel regarding emergency motion to disclose survivor identity.	0.50	675.00	\$337.50
07/01/2019	IDS	CO	Telephone call with debtor re motion to disclose survivor identity.	0.40	675.00	\$270.00
07/01/2019	IDS	CO	Review AD policy regarding disclosure of abuse claims.	0.70	675.00	\$472.50
07/01/2019	JIS	CO	Review motion regarding enforcement of procedures, telephone call with I. Scharf (2x), Brad Hall, Levi Monagle and Lisa Ford, review policies procedures.	0.90	675.00	\$607.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/01/2019	JIS	CO	Telephone call with Paul Linnenburger regarding confidentiality issue.	0.30	675.00	\$202.50
07/02/2019	IDS	CO	Claims analysis - perp analysis.	2.70	675.00	\$1,822.50
07/02/2019	IDS	CO	Email with Monagle regarding claims.	0.20	675.00	\$135.00
07/02/2019	IDS	CO	Prepare claims chart for committee	0.90	675.00	\$607.50
07/02/2019	IDS	CO	Prepare claim charts for counsel groups.	1.30	675.00	\$877.50
07/08/2019	IDS	CO	Follow up regarding numbering of claims; revise chat; email to SCC regarding same.	3.00	675.00	\$2,025.00
07/10/2019	IDS	CO	Continue claims analysis and review.	4.00	675.00	\$2,700.00
07/11/2019	IDS	CO	Continue claims analysis.	3.50	675.00	\$2,362.50
07/29/2019	IDS	CO	Work on perpetrators /related party analysis.	4.80	675.00	\$3,240.00
07/30/2019	IDS	CO	Work on claims analysis.	3.00	675.00	\$2,025.00
				26.20		\$17,685.00

General Creditors Comm. [B150]

07/02/2019	JIS	GC	Review issues regarding claims chart, email to Ford Elsaesser regarding mediator, email to Ilan Scharf re claims summary.	0.20	675.00	\$135.00
07/09/2019	JIS	GC	Draft status email to Committee members.	0.40	675.00	\$270.00
07/10/2019	JIS	GC	Telephone call with Ford Elsaesser re case status.	0.30	675.00	\$202.50
07/11/2019	JIS	GC	Telephone call with survivor re case status.	0.40	675.00	\$270.00
07/17/2019	JIS	GC	Prepare agendas and materials for meeting with state court counsel and committee.	0.70	675.00	\$472.50
07/17/2019	IDS	GC	Meet regarding in person meeting with Jim Stang.	0.70	675.00	\$472.50
07/18/2019	JIS	GC	Review insurance issues with Ilan Scharf and Iain Nasatir and preparation for state court counsel and committee meetings.	2.50	675.00	\$1,687.50
07/19/2019	IDS	GC	Prepare for in person meeting with Committee; claims analysis and report.	3.00	675.00	\$2,025.00
07/22/2019	JIS	GC	Telephone call with Ilan Scharf regarding committee meeting issues.	0.20	675.00	\$135.00
07/22/2019	JIS	GC	Prepare materials for State Court Counsel Meeting and Committee meeting.	2.10	675.00	\$1,417.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/22/2019	IDS	GC	Prepare for counsel meeting; update claims/insurance analysis.	4.30	675.00	\$2,902.50
07/23/2019	JIS	GC	Inspert AD property with I. Scharf.	2.00	675.00	\$1,350.00
07/23/2019	IDS	GC	Visit AD properties with Jim Stang.	2.00	675.00	\$1,350.00
07/23/2019	IDS	GC	Meet with SCC regarding counsel meeting.	3.00	675.00	\$2,025.00
07/24/2019	JIS	GC	Meeting with state court counsel.	3.00	675.00	\$2,025.00
07/24/2019	JIS	GC	Office conference with Ilan Scharf re agenda for meeting with state court counsel (.7); attend meeting with state court counsel (8.0).	8.70	675.00	\$5,872.50
07/24/2019	IDS	GC	Meet with Jim Stang regarding counsel meeting.	0.70	675.00	\$472.50
07/24/2019	IDS	GC	SCC meeting regarding claims, mediation, insurance and assets.	8.00	675.00	\$5,400.00
07/25/2019	JIS	GC	Meeting with Ilan Scharf re agenda (.7), attend Committee meeting (6.5); inspect Archdiocese real property (.2).	7.40	675.00	\$4,995.00
07/25/2019	JIS	GC	Telephone call Ford Elsaesser regarding mediation and meeting with committee.	0.40	675.00	\$270.00
07/25/2019	IDS	GC	Meet with JIS regarding Committee meeting.	0.70	675.00	\$472.50
07/25/2019	IDS	GC	Committee meeting regarding insurance, claims, process, mediation.	6.50	675.00	\$4,387.50
				57.20		\$38,610.00
Hearing						
07/01/2019	JIS	HE	Hearing regarding confidentiality of proofs of claim.	0.60	675.00	\$405.00
07/01/2019	IDS	HE	Attend telephonic hearing regarding emergency motion.	0.60	675.00	\$405.00
				1.20		\$810.00
Insurance Coverage						
07/01/2019	IAWN	IC	Reviewed Lee chart and requested revisions re same	0.20	675.00	\$135.00
07/02/2019	IAWN	IC	Exchanged emails with Jim Stang and Murray re telephone conference follow-up	0.40	675.00	\$270.00
07/03/2019	IAWN	IC	Exchange emails with Ford re Murray call	0.10	675.00	\$67.50
07/04/2019	IAWN	IC	Reviewed and analyzed coverage chart from debtor	1.40	675.00	\$945.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/08/2019	IAWN	IC	Exchange emails re telephone conference on Monday and attendees	0.20	675.00	\$135.00
07/08/2019	IAWN	IC	Telephone conference with debtors	0.80	675.00	\$540.00
07/08/2019	JIS	IC	Conference call with Debtor's insurance and bankruptcy counsel regarding coverage issues.	0.70	675.00	\$472.50
07/08/2019	IDS	IC	Coverage call with Debtor counsel.	1.00	675.00	\$675.00
07/08/2019	IDS	IC	Prepare for call regarding coverage.	0.80	675.00	\$540.00
07/09/2019	IDS	IC	Begin intensive coverage analysis.	2.20	675.00	\$1,485.00
07/15/2019	IAWN	IC	Exchange email re telephone conference re insurance	0.30	675.00	\$202.50
07/15/2019	IAWN	IC	Reviewed and analyzed POC charts from debtor for each insurer	1.20	675.00	\$810.00
07/16/2019	IAWN	IC	Review emails re telephone calls	0.20	675.00	\$135.00
07/17/2019	IAWN	IC	Telephone conference with SCC re insurance	1.00	675.00	\$675.00
07/17/2019	IAWN	IC	Preparation for telephone conference with SCC	1.80	675.00	\$1,215.00
07/18/2019	IAWN	IC	Meeting with James I Stang re materials and presentation in San Francisco on insurance	0.40	675.00	\$270.00
07/19/2019	IAWN	IC	Prepare for call with debtor	1.00	675.00	\$675.00
07/19/2019	IAWN	IC	Attend call with debtor	1.00	675.00	\$675.00
07/19/2019	IAWN	IC	Review emails between Jim Stang and SCC	0.20	675.00	\$135.00
07/19/2019	IAWN	IC	Prepare materials for Jim Stang and Ilan Scharf for meeting in Sante Fe	2.40	675.00	\$1,620.00
07/23/2019	IAWN	IC	Reviewed materials supplied by debtor re perps and timing, revised chart re same	2.20	675.00	\$1,485.00
07/31/2019	IAWN	IC	Review James I Stang email re sons of the holy father perps	0.10	675.00	\$67.50
				19.60		\$13,230.00

Plan & Disclosure Stmt. [B320]

07/18/2019	IDS	PD	Work on claims analysis prepare for mediation.	4.50	675.00	\$3,037.50
07/29/2019	JIS	PD	Telephone calls with Ford Elsaeseer and Bruce Anderson regarding mediation (2x).	1.40	675.00	\$945.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/29/2019	IDS	PD	Call with debtor counsel regarding mediation.	0.80	675.00	\$540.00
				6.70		\$4,522.50
Travel						
07/23/2019	JIS	TR	Los Angeles to Santa Fe for state court counsel and committee meeting. (Billed at 1/2 rate)	6.00	337.50	\$2,025.00
07/23/2019	IDS	TR	Travel from ABQ to Santa Fe. (Billed at 1/2 rate)	1.00	337.50	\$337.50
07/23/2019	IDS	TR	Travel to Albuquerque, NM from NYC (Billed at 1/2 rate)	9.00	337.50	\$3,037.50
07/25/2019	JIS	TR	Travel from Santa Fe to Los Angeles from Creditors Committee meeting. (Billed at 1/2 rate)	6.00	337.50	\$2,025.00
07/25/2019	IDS	TR	Travel from Santa Fe to Albuquerque. (Billed at 1/2 rate)	1.00	337.50	\$337.50
07/26/2019	IDS	TR	Travel from Albuquerque to NYC (Billed at 1/2 rate)	9.00	337.50	\$3,037.50
				32.00		\$10,800.00
TOTAL SERVICES FOR THIS MATTER:						\$92,205.00

Expenses

07/01/2019	CC	Conference Call [E105] AT&T Conference Call, IDS	3.39
07/03/2019	FE	Federal Express [E108]	32.26
07/03/2019	RE2	SCAN/COPY (140 @0.10 PER PG)	14.00
07/18/2019	CC	Conference Call [E105] AT&T Conference Call, JIS	8.94
07/23/2019	AT	Auto Travel Expense [E109] Uber Transportation Services, JIS	28.41
07/23/2019	HT	Hotel Expense [E110] Hilton Santa Fe, 2 night, JIS	764.12
07/23/2019	HT	Hotel Expense [E110] Hilton Santa Fe, 2 night, IDS	756.34
07/24/2019	HT	Hotel Expense [E110] Hilton Santa Fe, 1 night, ,IDS for Committee member. (I paid, but they stayed).	403.33
07/24/2019	HT	Hotel Expense [E110] Hilton Santa Fe, 1 night, IDS for Committee member. (I paid, but they stayed).	356.70
07/24/2019	HT	Hotel Expense [E110] Hilton Santa Fe, 1 night, IDS for Committee member. (I paid, but they stayed).	713.40
07/25/2019	AT	Auto Travel Expense [E109] Hertz Car Rental, 2 days, JIS	224.91
07/25/2019	AT	Auto Travel Expense [E109] Uber Transportation Services, IDS	9.55
07/25/2019	AT	Auto Travel Expense [E109] Uber Transportation Services, IDS	5.00
07/25/2019	OS	Rothstein Donatelli LLP, N.Robinson (meal reimbursement)	479.13
07/25/2019	TE	Travel Expense [E110] Mileage, 184 miles, C. Montoya	106.72
07/26/2019	AT	Auto Travel Expense [E109] Uber Transportation Services, IDS	5.00
07/26/2019	AT	Auto Travel Expense [E109] Uber Transportation Services, IDS	5.00
07/26/2019	AT	Auto Travel Expense [E109] Uber Transportation Services, IDS	11.87
07/26/2019	AT	Auto Travel Expense [E109] Uber Transportation Services, IDS	12.46
07/26/2019	HT	Hotel Expense [E110] Hilton Santa Fe, 07/25-07/26/19, 1 night, C. Montoya	333.61
07/26/2019	TE	Travel Expense [E110] Hudson News Stand, JIS	10.99
07/28/2019	AF	Air Fare [E110] Southwest Airlines, Tkt. 5262496776599, From OAK to ABQ, R. La Riva (round trip)	442.96
07/29/2019	HT	Hotel Expense [E110] Hilton Santa Fe, M. Berg	262.57
07/31/2019	PAC	Pacer - Court Research	4.90

Total Expenses for this Matter

\$4,995.56

REMITTANCE ADVICE

Please include this Remittance with your payment

For current services rendered through: 07/31/2019

Total Fees \$92,205.00

Total Expenses 4,995.56

Total Due on Current Invoice \$97,200.56

Outstanding Balance from prior invoices as of 07/31/2019 (May not include recent payments)

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
122014	01/01/2019	\$4,942.50	\$322.75	\$5,265.25
122027	02/28/2019	\$30,157.50	\$277.50	\$30,435.00
122029	03/31/2019	\$42,255.00	\$0.80	\$42,255.80
122274	01/31/2019	\$58,605.00	\$1,970.37	\$60,575.37
123009	04/30/2019	\$26,220.00	\$578.73	\$26,798.73
123014	05/31/2019	\$10,110.00	\$106.52	\$10,216.52
123021	06/30/2019	\$76,215.00	\$1,864.39	\$78,079.39

Total Amount Due on Current and Prior Invoices: \$350,826.62

Pachulski Stang Ziehl & Jones LLP

10100 Santa Monica Blvd.
13th Floor
Los Angeles, CA 90067

August 31, 2019

JIS

Invoice 123291

Client 05066

Matter 00002

JIS

RE: Committee Representation

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 08/31/2019

FEES	\$38,487.50
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EXPENSES	\$353.32
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TOTAL CURRENT CHARGES	\$38,840.82
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BALANCE FORWARD	\$350,826.62
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TOTAL BALANCE DUE	\$389,667.44
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Summary of Services by Professional

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
CHM	Mackle, Cia H.	Counsel	650.00	7.60	\$4,940.00
GIG	Glazer, Gabriel I.	Partner	675.00	2.00	\$1,350.00
IAWN	Nasatir, Iain A. W.	Partner	675.00	18.00	\$12,150.00
IDS	Scharf, Ilan D.	Partner	675.00	6.40	\$4,320.00
IMP	Pachulski, Isaac M.	Partner	675.00	0.40	\$270.00
JHD	Davidson, Jeffrey H.	Partner	675.00	1.70	\$1,147.50
JIS	Stang, James I.	Partner	675.00	20.80	\$14,040.00
KHB	Brown, Kenneth H.	Partner	675.00	0.40	\$270.00
				<hr/> 57.30	<hr/> \$38,487.50

Summary of Services by Task Code

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AA	Asset Analysis/Recovery[B120]	18.40	\$12,420.00
AC	Avoidance Actions	7.60	\$4,940.00
AD	Asset Disposition [B130]	0.70	\$472.50
CO	Claims Admin/Objections[B310]	6.20	\$4,185.00
GC	General Creditors Comm. [B150]	2.30	\$1,552.50
IC	Insurance Coverage	18.70	\$12,622.50
PD	Plan & Disclosure Stmt. [B320]	3.30	\$2,227.50
SL	Stay Litigation [B140]	0.10	\$67.50
		57.30	<hr/> \$38,487.50

Pachulski Stang Ziehl & Jones LLP
Archdiocese of Santa Fe O.C.C.
05066 - 00002

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Invoice 123291
August 31, 2019

Summary of Expenses

<u>Description</u>	<u>Amount</u>
Auto Travel Expense [E109]	\$95.21
Conference Call [E105]	\$6.74
Hotel Expense [E110]	\$244.66
Lexis/Nexis- Legal Research [E	\$1.11
Pacer - Court Research	\$5.60
	<hr/>
	\$353.32

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Asset Analysis/Recovery[B120]						
08/01/2019	JIS	AA	Hearing regarding Rule 2004 Motion (Foundation) (1.4); research regarding reach back periods, including IRS reach back, succession to prepetition reach back period; first day wage motion (5.5); telephone call with Cia Mackle re assignment (.4); telephone call with Levi Monagle and Brad Hall re state court complaints (.2).	7.50	675.00	\$5,062.50
08/01/2019	GIG	AA	Research and emails with J. Stang re 544(b)	2.00	675.00	\$1,350.00
08/01/2019	JHD	AA	Telephone conference with James I. Stang re F/T reachback issues; telephone call with Gabriel I. Glazer re same; research re same; multiple emails re same	1.70	675.00	\$1,147.50
08/01/2019	IMP	AA	Review email from James I. Stang re potential F/T claim; analyze issues, respond, review multiple follow up emails re same	0.40	675.00	\$270.00
08/02/2019	JIS	AA	Review order and update regarding OCD for draft order.	0.40	675.00	\$270.00
08/05/2019	JIS	AA	Telephone call with Paul Fish regarding Holy Family perpetrators.	0.10	675.00	\$67.50
08/05/2019	JIS	AA	Telephone call with Paul Fish regarding rule 2004 exam.	0.10	675.00	\$67.50
08/05/2019	IDS	AA	Respond to P. Linnenburger email regarding criminal case.	0.20	675.00	\$135.00
08/06/2019	JIS	AA	Draft order regarding Rule 2004 exam (Catholic Foundation).	0.90	675.00	\$607.50
08/08/2019	JIS	AA	Revise draft of Foundation order.	0.30	675.00	\$202.50
08/13/2019	JIS	AA	Review draft order from Paul Fish and email response.	0.10	675.00	\$67.50
08/22/2019	JIS	AA	Email regarding marketability of real property.	0.50	675.00	\$337.50
08/27/2019	JIS	AA	Finalize order re Foundation and email to Fish re same.	0.20	675.00	\$135.00
08/28/2019	KHB	AA	Confer with J. Stang re cemetery funerals as property of the estate.	0.20	675.00	\$135.00
08/28/2019	JIS	AA	Review of Catholic Cemetery Association documents and email to Rob Charles re same.	2.40	675.00	\$1,620.00
08/28/2019	JIS	AA	Review DLF document production.	1.20	675.00	\$810.00
08/29/2019	KHB	AA	Review discovery requests to Cemetery Assn.	0.10	675.00	\$67.50
08/29/2019	KHB	AA	Consider alter ego claims.	0.10	675.00	\$67.50

				18.40		\$12,420.00
Avoidance Actions						
08/02/2019	CHM	AC	Legal research re IRS reachback period and discovery of fraud.	7.60	650.00	\$4,940.00
				7.60		\$4,940.00
Asset Disposition [B130]						
08/30/2019	JIS	AD	Telephone call re property issues.	0.70	675.00	\$472.50
				0.70		\$472.50
Claims Admin/Objections[B310]						
08/06/2019	IDS	CO	Revise claims analysis spreadsheet.	1.70	675.00	\$1,147.50
08/06/2019	IDS	CO	Continue analysis of third party defendants, contribution sources.	1.40	675.00	\$945.00
08/07/2019	IDS	CO	Respond to inquiry from C. Vernon regarding claims.	0.80	675.00	\$540.00
08/08/2019	IDS	CO	Work on claims analysis/ settlement	0.80	675.00	\$540.00
08/08/2019	IDS	CO	Update insurance information on spreadsheet	0.80	675.00	\$540.00
08/13/2019	IDS	CO	Call with SCC regarding claims and insurance	0.70	675.00	\$472.50
				6.20		\$4,185.00
General Creditors Comm. [B150]						
08/29/2019	JIS	GC	Conference call with Debtor and mediator and follow up conference with Iain Nasatir.	1.30	675.00	\$877.50
08/29/2019	JIS	GC	Email to state court counsel regarding conference call with Debtor and Mediator	1.00	675.00	\$675.00
				2.30		\$1,552.50
Insurance Coverage						
08/12/2019	IAWN	IC	Exchange emails with Ilan Scharf re settlement agreements, pull same and send to Fasay	0.30	675.00	\$202.50
08/13/2019	IAWN	IC	Exchange emails with James I Stang re mediation	0.10	675.00	\$67.50
08/14/2019	IAWN	IC	Exchange emails and telephone call with Fasay re GA coverage, draft email re same to James I Stang and Ilan Scharf	0.90	675.00	\$607.50
08/15/2019	IAWN	IC	Exchange emails with James I Stang re mediation, review mediation order	0.10	675.00	\$67.50

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/16/2019	IAWN	IC	Draft and send email to Archdiocese of Santa Fe re exhaustion analysis	0.10	675.00	\$67.50
08/20/2019	IAWN	IC	Review Paraclete pleadings and circulate same	0.80	675.00	\$540.00
08/20/2019	IAWN	IC	Attended mediation with James I Stang, meeting with SCC	11.00	675.00	\$7,425.00
08/22/2019	IAWN	IC	Exchange emails with Fasay and James I Stang re telephone conference on coverage	0.10	675.00	\$67.50
08/22/2019	IAWN	IC	Emails to Archdiocese of Santa Fe re exhaustion analysis and discovery	0.10	675.00	\$67.50
08/22/2019	IAWN	IC	Exchange emails with SCC re call	0.10	675.00	\$67.50
08/22/2019	IAWN	IC	Calculate claims under GA policies	0.80	675.00	\$540.00
08/23/2019	IAWN	IC	Prepare for call re coverage, analyze settlements and coverage, attend telephone conference with SCC re coverage and exhaustion	2.70	675.00	\$1,822.50
08/23/2019	JIS	IC	Telephone call with Iain Nasatir and state court counsel regarding insurance issues.	0.70	675.00	\$472.50
08/30/2019	IAWN	IC	Office conference and telephone conferences with James I Stang re claims to test coverage and automatic stay, review coverage chart re same	0.90	675.00	\$607.50
				18.70		\$12,622.50

Plan & Disclosure Stmt. [B320]

08/05/2019	JIS	PD	Review list of priests from counsel for Sons of Holy Family and email response.	0.20	675.00	\$135.00
08/05/2019	JIS	PD	Draft and send email to Fish regarding Sons participation/access to proofs of claim.	0.20	675.00	\$135.00
08/14/2019	JIS	PD	Review proposed mediation order and motion.	0.10	675.00	\$67.50
08/15/2019	JIS	PD	Conference call with Debtor's counsel regarding mediation order (.8) and review revision to same based on call (.2).	1.00	675.00	\$675.00
08/23/2019	JIS	PD	Telephone call with Ford Elsaesser regarding mediation.	0.40	675.00	\$270.00
08/30/2019	JIS	PD	Review Travelers insurance charts and emails to SCC for review of claims valuation.	1.40	675.00	\$945.00
				3.30		\$2,227.50

Stay Litigation [B140]

08/27/2019	JIS	SL	Telephone call to/from counsel for stay relief movant on quiet title action.	0.10	675.00	\$67.50
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Pachulski Stang Ziehl & Jones LLP
Archdiocese of Santa Fe O.C.C.
05066 - 00002

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0.10

\$67.50

TOTAL SERVICES FOR THIS MATTER:

\$38,487.50

Expenses

08/01/2019	CC	Conference Call [E105] Loop Up Conference Call, JIS	0.14
08/01/2019	LN	05066.00002 Lexis Charges for 08-01-19	0.93
08/12/2019	HT	Hotel Expense [E110] Hilton Santa Fe, M. Berg	122.33
08/12/2019	HT	Hotel Expense [E110] M. Berg	122.33
08/23/2019	CC	Conference Call [E105] AT&T Conference Call, IAWN	6.60
08/27/2019	AT	Auto Travel Expense [E109] Lyft Transportation Services, R. La Riva	95.21
08/29/2019	LN	05066.00002 Lexis Charges for 08-29-19	0.18
08/31/2019	PAC	Pacer - Court Research	5.60
Total Expenses for this Matter			\$353.32

REMITTANCE ADVICE

Please include this Remittance with your payment

For current services rendered through: 08/31/2019

Total Fees **\$38,487.50**

Total Expenses **353.32**

Total Due on Current Invoice **\$38,840.82**

Outstanding Balance from prior invoices as of 08/31/2019 (May not include recent payments)

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
122014	01/01/2019	\$4,942.50	\$322.75	\$5,265.25
122027	02/28/2019	\$30,157.50	\$277.50	\$30,435.00
122029	03/31/2019	\$42,255.00	\$0.80	\$42,255.80
122274	01/31/2019	\$58,605.00	\$1,970.37	\$60,575.37
123009	04/30/2019	\$26,220.00	\$578.73	\$26,798.73
123014	05/31/2019	\$10,110.00	\$106.52	\$10,216.52
123021	06/30/2019	\$76,215.00	\$1,864.39	\$78,079.39
123202	07/31/2019	\$92,205.00	\$4,995.56	\$97,200.56

Total Amount Due on Current and Prior Invoices: **\$389,667.44**

Pachulski Stang Ziehl & Jones LLP

10100 Santa Monica Blvd.
13th Floor
Los Angeles, CA 90067

September 30, 2019

Invoice 123345

Client 05066

Matter 00002

JIS

JIS

RE: Committee Representation

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 09/30/2019

FEES \$23,355.00

EXPENSES \$10.10

TOTAL CURRENT CHARGES **\$23,365.10**

BALANCE FORWARD **\$439,100.02**

A/R Adjustments **-\$49,432.58**

TOTAL BALANCE DUE **\$413,032.54**

Summary of Services by Professional

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
IAWN	Nasatir, Iain A. W.	Partner	675.00	11.90	\$8,032.50
IDS	Scharf, Ilan D.	Partner	675.00	11.30	\$7,627.50
JIS	Stang, James I.	Partner	675.00	11.40	\$7,695.00
				<hr/> 34.60	<hr/> \$23,355.00

Summary of Services by Task Code

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AA	Asset Analysis/Recovery[B120]	0.90	\$607.50
AD	Asset Disposition [B130]	1.40	\$945.00
BL	Bankruptcy Litigation [L430]	0.70	\$472.50
CA	Case Administration [B110]	0.20	\$135.00
CO	Claims Admin/Objections[B310]	1.80	\$1,215.00
CP	Compensation Prof. [B160]	2.50	\$1,687.50
GC	General Creditors Comm. [B150]	1.60	\$1,080.00
IC	Insurance Coverage	14.50	\$9,787.50
PD	Plan & Disclosure Stmt. [B320]	10.90	\$7,357.50
SL	Stay Litigation [B140]	0.10	\$67.50
		34.60	<hr/> \$23,355.00

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Archdiocese of Santa Fe O.C.C.
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Summary of Expenses

<u>Description</u>	<u>Amount</u>
Pacer - Court Research	\$10.10
	<hr/>
	\$10.10

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Asset Analysis/Recovery[B120]						
09/03/2019	JIS	AA	Emails regarding Catholic Foundation Rule 2004 exam order and phone conference with creditor attorney re same.	0.60	675.00	\$405.00
09/17/2019	JIS	AA	Telephone call to Cia Mackle regarding Foundation documents and email re scope of assignment.	0.30	675.00	\$202.50
				0.90		\$607.50
Asset Disposition [B130]						
09/06/2019	IDS	AD	Preprepare for and attend call with SCC regarding mediation.	1.20	675.00	\$810.00
09/13/2019	JIS	AD	Telephone call regarding real property disposition.	0.20	675.00	\$135.00
				1.40		\$945.00
Bankruptcy Litigation [L430]						
09/03/2019	IDS	BL	Review letter regarding St. Charles loan.	0.70	675.00	\$472.50
				0.70		\$472.50
Case Administration [B110]						
09/03/2019	JIS	CA	Update Ilan Scharf on case status.	0.20	675.00	\$135.00
				0.20		\$135.00
Claims Admin/Objections[B310]						
09/03/2019	IDS	CO	Review order regarding committee approval for permitted party access to claims.	0.40	675.00	\$270.00
09/10/2019	IDS	CO	Begin detailed claim analysis.	1.20	675.00	\$810.00
09/17/2019	IDS	CO	Email addendum to confidentiality to B. Anderson.	0.20	675.00	\$135.00
				1.80		\$1,215.00
Compensation Prof. [B160]						
09/05/2019	IDS	CP	Revise PSZJ invoices for fee application.	1.40	675.00	\$945.00
09/18/2019	IDS	CP	Revise PSZJ July invoice for fee application.	0.50	675.00	\$337.50
09/19/2019	IDS	CP	Review PSZJ August 2019 invoice for fee application.	0.60	675.00	\$405.00

				2.50		\$1,687.50
General Creditors Comm. [B150]						
09/04/2019	JIS	GC	Draft memo to Committee on status and stay relief motion.	0.50	675.00	\$337.50
09/04/2019	JIS	GC	Memo regarding affiliated parties.	0.20	675.00	\$135.00
09/17/2019	JIS	GC	Draft memo to Committee for meeting.	0.60	675.00	\$405.00
09/20/2019	IDS	GC	Email to committee regarding mediation.	0.30	675.00	\$202.50
				1.60		\$1,080.00
Insurance Coverage						
09/03/2019	IAWN	IC	Review and exchange emails with Diocese counsel re telephone call re exhaustion analysis; review coverage charts re same for missing assumptions order.1, review revised order.,2 1.7	1.20	675.00	\$810.00
09/03/2019	JIS	IC	Review exclusion list and phone conference with Iain Nasatir re same.	0.50	675.00	\$337.50
09/04/2019	IAWN	IC	Review and analyze exhaustion analysis from Diocese	1.00	675.00	\$675.00
09/04/2019	IAWN	IC	Review emails with SCC re call Friday	0.10	675.00	\$67.50
09/06/2019	IAWN	IC	Telephone conference with Diocese counsel re exhaustion analysis	0.50	675.00	\$337.50
09/06/2019	IAWN	IC	Telephone conference with Diocese counsel	0.50	675.00	\$337.50
09/06/2019	JIS	IC	Conference call with state court counsel regarding insurance call with Debtor.	0.90	675.00	\$607.50
09/06/2019	JIS	IC	Conference call with Debtor's counsel regarding insurance issues.	1.00	675.00	\$675.00
09/11/2019	IAWN	IC	Review emails with SCC re meeting	0.10	675.00	\$67.50
09/11/2019	IAWN	IC	Review draft letter to papas from Diocese counsel, email to James I. Stang re same and review response to SCC	0.70	675.00	\$472.50
09/12/2019	IAWN	IC	Review emails re meeting and materials to Papas for mediation	0.10	675.00	\$67.50
09/17/2019	IAWN	IC	Review James I Stang memorandum and Diocese counsel email re mediation participants, status, insurance etc.	1.00	675.00	\$675.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/20/2019	JIS	IC	Review Murray insurance chart and call with Iain Nasatir re same.	0.20	675.00	\$135.00
09/23/2019	IAWN	IC	Initial analysis of chart, exchange emails with James I Stang re need for call with coverage counsel for diocese	0.50	675.00	\$337.50
09/24/2019	IAWN	IC	Review and exchange emails with Diocese counsel re occurrence chart and insurance; need for call, James I Stang availability	0.40	675.00	\$270.00
09/24/2019	IAWN	IC	Review and analyze occurrence chart and insurance	1.20	675.00	\$810.00
09/25/2019	IAWN	IC	Exchange emails with Carter and James I Stang re call on chart	0.10	675.00	\$67.50
09/26/2019	IAWN	IC	Prepare for and attend call with carter exhaustion in occurrence chart and explanation of columns	0.80	675.00	\$540.00
09/27/2019	IAWN	IC	Draft cover email to James I. Stang and Ilan Scharf re mediator correspondence and Carter telephone conference re chart	0.40	675.00	\$270.00
09/27/2019	IAWN	IC	Exchange emails with mediator re timing of call, helpful insurance information, pull same and forward to mediator	1.00	675.00	\$675.00
09/30/2019	IAWN	IC	Telephone conference with James I. Stang re status and claims	0.50	675.00	\$337.50
09/30/2019	IAWN	IC	Prepare for and attend mediator call re insurance	1.80	675.00	\$1,215.00
				14.50		\$9,787.50

Plan & Disclosure Stmt. [B320]

09/03/2019	IDS	PD	Email to committee regarding mediation.	0.40	675.00	\$270.00
09/06/2019	JIS	PD	Continued calls regarding mediation with state court counsel.	0.70	675.00	\$472.50
09/06/2019	IDS	PD	Prepare for and attend call with debtor's counsel regarding mediation.	1.00	675.00	\$675.00
09/06/2019	IDS	PD	Telephone conference with Jim Stang regarding mediation.	0.30	675.00	\$202.50
09/11/2019	JIS	PD	Conference call with mediator and Debtor regarding mediation issues.	1.50	675.00	\$1,012.50
09/11/2019	IDS	PD	Prepare claim breakdown for mediator.	0.90	675.00	\$607.50
09/11/2019	IDS	PD	Call with mediator and Debtor's counsel.	1.00	675.00	\$675.00

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
09/13/2019	JIS	PD	Telephone call with state court counsel regarding mediation issues.	1.00	675.00	\$675.00
09/16/2019	JIS	PD	Conference call with mediator re case background.	1.50	675.00	\$1,012.50
09/16/2019	IDS	PD	Telephone conference with Jim Stang regarding mediation.	0.20	675.00	\$135.00
09/16/2019	IDS	PD	Call with J. Pappas regarding mediation.	1.00	675.00	\$675.00
09/17/2019	JIS	PD	Review letter from L. Monagle re claims analysis.	0.20	675.00	\$135.00
09/20/2019	JIS	PD	Telephone conference with state court counsel regarding mediation strategy.	0.90	675.00	\$607.50
09/25/2019	JIS	PD	Telephone call with Leo Papas regarding pre-mediation discussions.	0.30	675.00	\$202.50
				10.90		\$7,357.50
Stay Litigation [B140]						
09/05/2019	JIS	SL	Review email regarding stay relief on Quiet title action and respond to same.	0.10	675.00	\$67.50
				0.10		\$67.50
TOTAL SERVICES FOR THIS MATTER:						\$23,355.00

Pachulski Stang Ziehl & Jones LLP
Archdiocese of Santa Fe O.C.C.
05066 - 00002

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September 30, 2019

Expenses

09/30/2019 PAC Pacer - Court Research

10.10

Total Expenses for this Matter

\$10.10

REMITTANCE ADVICE

Please include this Remittance with your payment

For current services rendered through: 09/30/2019

Total Fees \$23,355.00

Total Expenses 10.10

Total Due on Current Invoice \$23,365.10

Outstanding Balance from prior invoices as of 09/30/2019 (May not include recent payments)

<u>A/R Bill Number</u>	<u>Invoice Date</u>	<u>Fees Billed</u>	<u>Expenses Billed</u>	<u>Balance Due</u>
122014	01/01/2019	\$4,942.50	\$322.75	\$5,265.25
122027	02/28/2019	\$30,157.50	\$277.50	\$30,435.00
122029	03/31/2019	\$42,255.00	\$0.80	\$42,255.80
122274	01/31/2019	\$58,605.00	\$1,970.37	\$60,575.37
123009	04/30/2019	\$26,220.00	\$578.73	\$26,798.73
123014	05/31/2019	\$10,110.00	\$106.52	\$10,216.52
123021	06/30/2019	\$76,215.00	\$1,864.39	\$78,079.39
123202	07/31/2019	\$92,205.00	\$4,995.56	\$97,200.56
123291	08/31/2019	\$38,487.50	\$353.32	\$38,840.82

Total Amount Due on Current and Prior Invoices: \$413,032.54

EXHIBIT C

SUMMARY OF TIME CHARGES BY CATEGORY

<u>CATEGORY</u>	<u>HOURS</u>	<u>FEES</u>
Asset Analysis/Recovery[B120]	118.10	\$77,880.00
Asset Disposition [B130]	2.10	\$1,417.50
Avoidance Actions	7.60	\$4,940.00
Bankruptcy Litigation [L430]	3.40	\$2,295.00
Case Administration [B110]	3.50	\$2,242.50
Claims Admin/Objections[B310]	137.70	\$77,040.00
Compensation Prof. [B160]	4.10	\$2,767.50
Employee Benefit/Pension-B220	2.70	\$1,822.50
Financial Filings [B110]	0.40	\$270.00
Financing [B230]	3.00	\$2,025.00
General Creditors Comm. [B150]	127.10	\$85,792.50
Hearing	3.80	\$2,565.00
Insurance Coverage	118.80	\$80,190.00
Litigation (Non-Bankruptcy)	1.80	\$1,215.00
Meeting of Creditors [B150]	22.90	\$15,607.50
Operations [B210]	1.80	\$1,215.00
Plan & Disclosure Stmt. [B320]	23.20	\$15,660.00
PSZ&J Compensation	0.20	\$135.00
Retention of Prof. [B160]	3.90	\$2,632.50
Stay Litigation [B140]	7.60	\$5,130.00
Travel	57.00	\$19,237.50
	0.70	\$472.50
TOTAL	651.40	\$402,065.00

EXHIBIT D

SUMMARY OF EXPENSES

<u>DESCRIPTION</u>	<u>AMOUNT</u>
Airfare	\$1,976.86
Airport Parking	\$108.00
Auto Travel Expense	\$468.67
Conference Call	\$608.03
Courtlink	\$69.48
Federal Express	\$32.26
Hotel Expense	\$4,394.73
Legal Vision Atty Mess Service	\$67.40
Lexis/Nexis- Legal Research	\$1.11
Outside Services	\$479.13
Pacer-Court Research	\$599.40
Postage	\$14.00
Reproduction Expense	\$207.80
Reproduction/ Scan Copy	\$57.90
Transcript	\$428.48
Travel Expenses	\$406.08
Working Meals [E111]	\$560.71
TOTAL	\$10,480.04

EXHIBIT E

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW MEXICO**

In re:

ROMAN CATHOLIC CHURCH OF THE
ARCHDIOCESE OF SANTA FE, a New Mexico
corporation sole,

Debtor.

Chapter 11

Case No. 18-13027-t11

**DECLARATION OF ILAN D. SCHARF IN SUPPORT OF FIRST
INTERIM APPLICATION FOR ALLOWANCE AND PAYMENT
OF PROFESSIONAL COMPENSATION AND REIMBURSEMENT OF
EXPENSES BY PACHULSKI STANG ZIEHL & JONES LLP FOR THE
PERIOD FROM DECEMBER 18, 2018 THROUGH SEPTEMBER 30, 2019**

I, Ilan D. Scharf, declare and state as follows:

1. I am a partner in the law firm of Pachulski Stang Ziehl & Jones LLP (“PSZJ”) counsel to the Official Committee of Unsecured Creditors (the “Committee”). I am an attorney at law duly authorized to practice before all of the courts of the State of New York.
2. I make this Declaration in support of *First Interim Application for Allowance and Payment of Professional Fees and Reimbursement of Expenses of Pachulski Stang Ziehl & Jones LLP for the Period From December 18, 2018 Through September 30, 2019* (the “Application”).
3. I have personal knowledge of the facts set forth in this Declaration. If called as a witness I could and would competently testify thereto.
4. I drafted this Application and this Declaration, and reviewed and/or edited PSZJ’s bills (at **Exhibit B** to the Application). At my direction, a paralegal of PSZJ prepared Exhibits A, C and D to the Application. The Application and Exhibits A through D to the Application are true and correct to the best of my knowledge.
5. In accordance with Federal Rule of Bankruptcy Procedure 2016 and 11 U.S.C. § 504, I confirm that no agreement or understanding exists between PSZJ and any other person

for the sharing of any of PSZJ's compensation for fees or expenses in this case, other than the distribution of profits among PSZJ's partners. Furthermore, PSZJ has not made, and will not make, any agreement to share compensation (excluding the sharing of profits among PSZJ's partners) or any other agreement prohibited by 11 U.S.C. § 504 or 18 U.S.C. § 155.

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.

Executed on the 26th day of November, 2019, at New York, New York.

/s/ Ilan D. Scharf

Ilan D. Scharf